

Housing Authority of Baltimore City Moving To Work Agency

The MTW Annual Plan for Fiscal Year 2015

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I. Introduction and Overview

The Housing Authority of Baltimore City (HABC) entered into a ten-year Moving to Work Agreement (MTW Agreement) with the US Department of Housing and Urban Development (HUD) effective as of December 24, 2008. Through a previous agreement between HUD and HABC, HABC has been a full participant in the MTW program since 2005.

MTW is a national demonstration program authorized by Congress which gives HABC the flexibility to waive certain statutes and HUD regulations pertaining to the Public Housing and Housing Choice Voucher (HCV) programs. The MTW statutory objectives include the following:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and,
- 3) Increase housing choices for low-income families.

The MTW activities undertaken and/or planned by HABC are all designed to promote one or more of the statutory objectives.

This document is the MTW Annual Plan for Fiscal Year 2015, which is the period from July 1, 2014 to June 30, 2015. The Plan was approved by the HABC Board of Commissioners on July 11, 2014. Prior to HABC's Board approval resident input was obtained, information on a 30-Day Notice and Comment period (June 1, 2014 and expired July 1, 2014) was published in the local newspapers and a public hearing which was held on June 17, 2014.

HABC is required to prepare this Annual Plan in conformance with the specifications of HUD Form 50900 "Elements for the Annual MTW Plan and Annual MTW Report". For purposes of this document and the required submission to HUD, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements.

In order to provide the public and HUD with a more detailed view of HABC's overall plans and strategies, this Annual Plan includes discussions of both MTW activities and other activities which do not specifically require MTW authority to implement. It also references and details proposed changes to both the HCV Administrative Plan and the Public Housing ACOP (Admissions & Continued Occupancy Policies).

Overview of FY 2015 Objectives and Activities

As of the publication date of this Annual Plan,(February 21, 2014), Congress has not finalized calendar year 2014 funding for critical programs administered by HABC including the Public Housing Operating Fund and Housing Choice Voucher Program. Published reports indicate the potential for significant cutbacks to HABC and Public Housing Authorities nationwide. Thus, the programs and initiatives described herein may need to be modified based on final funding decisions.

A. Short-Term Goals and Objectives

HABC's goals for the current and future years of the MTW Demonstration include supporting neighborhood revitalization, reducing administrative costs and promoting resident economic self-sufficiency. During Fiscal Year 2015, HABC intends to work towards these overarching goals by undertaking a broad range of housing, capital improvement, resident services and development activities as described in this Plan. Major non-MTW initiatives and objectives for the year ahead include:

- Public Housing Occupancy – HABC projects that it will achieve a 97% adjusted occupancy rate in its public housing developments.
- Leased Housing Lease Ups – HABC projects that it will have a total of 15,743 units under lease including Thompson and all other programs.
- HABC received a letter from HUD dated November 19, 2013 approving the inclusion of project-based vouchers and other affordable housing development options for HABC's development methods. We are currently accumulating Replacement Housing Factor Funds for grant years 2011 through 2014 for approximately \$19.1 million for future development projects. We anticipate spending approximately \$900,000 in FY 15 for pre-development fees for the O'Donnell Heights Phase 1B replacement housing project. HABC will comply with the new Capital Fund rules involving the development of new affordable housing.
- Portfolio Planning –HABC will continue its ongoing portfolio assessment including assessing capital needs, developing a capital spending plan and strategy, and identifying a framework for future development activity. In tandem, both traditional and non-traditional sources of funding will be assessed (we continue to analyze our Choice Neighborhood Program options) including identifying ways in which MTW flexibility can be used to leverage and support reinvestment in HABC developments.

HABC has submitted eleven applications, and one portfolio application (for a total of 22 public housing sites) to HUD for redevelopment options of existing inventory related to the Rental Assistance Demonstration Program (RAD). On December 24, 2013 HABC received its Commitment for Housing Authority Payment (CHAP) letter for the first eleven of twenty-two sites. In FY 2015 HABC plans to move forward with placing the following public housing sites into the RAD Program:

- Bel-Park Tower
- Bernard E. Mason, Sr. Apts.
- Hollins House
- Lakeview Towers
- McCulloh Homes Extension
- Pleasant View Gardens
- Primrose House
- Chase House
- The Allendale

- The Brentwood
- Wyman House

For more information on the sites scheduled for RAD implementation in FY 2015, see Appendix M.

- Resident Services – HABC plans to serve over 6,000 households through a wide array of self sufficiency, personal development and supportive service program offerings including a Targeted Unemployment Initiative which assists unemployed residents to obtain jobs through a comprehensive program of supportive services.

Capital Planning – HABC will continue its program of capital improvements and development activities. Major highlights include steam and gas line repairs and roof replacement at several HABC family sites. Development activities involve new construction of approximately sixty-six handicap accessible units and the acquisition/or development of approximately 110 new affordable housing units. HABC projects MTW and Non-MTW capital expenditures of approximately \$60.5 million in the coming year. HABC has combined all current and prior year Capital funds, including RHF funds, into the MTW Block Grant.

Other FY 2015 objectives which utilize HABC's MTW flexibility and which promote one or more of the MTW statutory objectives will include:

- Risk-Based Inspections – HABC will continue to analyze data and trends in annual inspections to determine the best implementation method for the Risk Based Inspection process and will complete implementation planning for a risk-based inspection program of leased Housing Choice Voucher units in FY 2015. Currently, the HCVP is attempting to measure certain trends as accurately as possible given the current system software. The new software, now installed and operational, will provide the HCVP with the appropriate tools necessary to measure trends properly. Implementation will be delayed until the new system software is completely operational.
- Three-Year Recertifications (HCVP) – Under MTW, HCV households will continue to be recertified every two years; however, HABC transitioned elderly and/or disabled families on fixed incomes to a three year recertification schedule. All other families will remain on a two-year cycle except for the Non-MTW voucher families noted. (VASH, some NEDS vouchers).
- Two-Year Recertifications (PH) - HABC is still searching for ways to revise and expand its current public housing two year recertification initiative to: 1) include all households with employment or TANF as primary income sources in addition to all fixed income households; and, 2) Modify the current procedure by which income, family composition, and disability status is verified between the regularly scheduled two year recertification dates.
- Project Based Vouchers – An estimated 90 additional housing units will be leased under HABC's PBV program.

In FY 2015, HABC will continue to work closely with the Mayor's Office and other stakeholders to implement the Journey Home, Baltimore's Ten Year Plan to End Homelessness. HABC will continue to play a major role in the planning and implementation of this comprehensive, multi-disciplinary long-term initiative. Though most of the initiatives implemented do not require HABC to use its MTW Authority, virtually all of HABC's program activities help to support the goals of preventing and reducing homelessness in the City by providing quality, affordable housing to extremely low income families who would be at risk of homelessness without HABC's resources. HABC's commitment to the Mayor's initiative includes the following targeted initiatives:

- Housing First Homeless Initiative – This initiative does not require MTW Authority as HABC provides up to 500 Housing Choice Vouchers to eligible chronically homeless households referred by Baltimore Homeless Services (BHS). Participants use their vouchers to find affordable permanent housing, while receiving supportive services from BHS and other agencies.
- Re-Entry Program – This program links permanent housing with supportive services to assist up to 200 chronically homeless individuals and families with an ex-offender household member. Referrals are made to HABC by the Mayor's Office of Criminal Justice and Baltimore Homeless services. MTW Authority is not required for this initiative.
- The Front Door Program – An MTW activity, which partners HABC with the Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless); and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program that will rapidly house 36 homeless families for up to one (1) year, until they become self-sufficient.
- Eviction Prevention – In Failure to Pay ("FTP") court cases HABC has implemented an eviction prevention program prior to the family's right to redeem the property is foreclosed upon. This program assists existing HABC residents with meeting their lease responsibilities and avoiding eviction action. This initiative continues to have a significant impact in preventing homelessness by reducing the number of HABC families evicted for lease violations or non-payment. As State law provides for the Right to Foreclose Redemption of HABC property, no MTW Authority is needed.
- Memorandum of Understanding ("MOU") – In Breach of Lease ("BOL") court actions HABC may enter into an MOU with the family found to be in non-compliance with the HABC Dwelling Lease. The MOU will set forth the conditions under which the family will cure the non-compliance and remain in the unit. No MTW Authority is required for this activity.
- The Thompson Settlement Agreement - In 1995 a class action entitled *Thompson v. HUD*, No. MJG 95-309, was filed in U.S. District Court for the District of Maryland against the Housing Authority of Baltimore City (HABC), the City of Baltimore and the U.S. Department of Housing and Urban Development (HUD). The plaintiffs alleged that African-American residents of and applicants for public housing and Section 8 vouchers had been discriminated against based upon their race. Certain parts of the case were settled by the parties through a Partial Consent Decree approved by the District Court in June 1996.

In November 2012, the District Court approved a final Settlement Agreement. The *Thompson* Settlement Agreement makes available up to 2,600 additional Housing Choice Vouchers from 2012 through 2018 (“*Thompson* Remedial Vouchers”), in addition to the 1,788 Housing Choice Vouchers already utilized under the *Thompson* Partial Consent Decree (“*Thompson* PCD-Leased Vouchers”). The Settlement Agreement also provides for the continuation of the *Thompson* Homeownership Voucher Program. The Baltimore Regional Housing Program administers the vouchers for the *Thompson* Remedial and Partial Consent Decree vouchers. As such, the use of MTW Authority is often used to promote the three (3) statutory objectives.

All *Thompson* Remedial, PCD-Leased, and Homeownership Vouchers must be used in Communities of Opportunity throughout the Baltimore metropolitan housing market as identified in the *Thompson* Settlement Agreement.

The *Thompson* Consent Decree included a provision that prohibited HABC from using public housing capital and operating funds to create public housing units in impacted areas in Baltimore City. The settlement of the Consent Decree has removed this prohibition and HABC is no longer prohibited from creating public housing units in these areas.

Required information on the programs under *Thompson*, ongoing and newly proposed MTW activities is incorporated into the remaining chapters of the Annual Plan.

B. Long-Term Goals and Objectives

In its initial request for MTW designation, HABC expressed the intention to implement a number of initiatives in both the HCV and public housing programs to support neighborhood revitalization, reduce administrative costs and promote resident economic self-sufficiency.

HABC is committed to creating new affordable housing opportunities for City residents at a wide range of incomes. Within its financial constraints, HABC plans to replace lost public housing units through the production of new homes for existing public housing residents and others with incomes that would qualify for public housing. In its redevelopment efforts, HABC will strive to create vibrant, mixed-income neighborhoods that will benefit both local residents and the wider community.

By making funds available to the public housing program utilizing MTW authority and an aggressive strategy for vacancy renovations/modernizations, HABC has been able to increase the number of households housed in public housing by 725 households between June 2006 and December 2013. In addition, as HABC nears completion of major renovation efforts to bring long-term vacant and uninhabitable units back on line, resources shifted back to the Housing Choice Voucher program which has resulted in serving 1,569 more households during the same period (Excludes Substantial Rehab, New Construction, VASH and *Thompson* Tenant and Project Based Vouchers).

Commencing in late 2010, HABC began to conduct a portfolio wide asset review. The results of this process, which is continuing into FY 15, will provide a roadmap and framework for future investments and development activities. As part of this process, HABC is exploring ways in which MTW flexibility can help to support the agency’s ability to leverage both traditional and non-traditional sources of funding.

Other proposed long-term MTW initiatives include:

- Reducing the frequency of recertifications as a way to lower administrative costs, promote household savings, and minimize the burden imposed by this process on resident households. As noted in the Plan, HABC has implemented this initiative for Housing Choice Voucher participants, and for Public Housing residents. Over the term of the MTW Agreement, HABC will also implement other MTW initiatives designed to simplify program administration and reduce costs;
- Implementing modified Project Based leasing programs to support City-sponsored targeted neighborhood revitalization. HABC has begun to implement an ambitious Project Based Voucher program that incorporates MTW flexibility and expands housing choice for program participants, as described herein. Utilization of Project Based resources is a key component of HABC's neighborhood reinvestment, new housing production, and Bailey Consent Decree production initiatives;
- Pursuant to MTW authority, HABC modified its Long-Term Affordable (LTA) Program to promote the long term affordability of units. Under this initiative, HABC entered into LTA Project Based contracts with developers/owners for some or all units to be developed on distressed former public housing sites, in rehabilitated or existing units in tax credit developments and through other development methods. LTA contracts are for a minimum forty (40) year term. The LTA Units shall be managed and operated primarily in accordance with the HUD regulations governing public housing units (*e.g.*, 24 CFR Parts 5, 960, 966, and the like) (the "Public Housing Regulations"), even though the LTA-PB Units will be subsidized with project based voucher funds.

HABC will also implement other MTW initiatives designed to simplify program administration and reduce costs;

- Streamlining income, deduction and rent calculation policies and procedures. Retrofitting vacant public housing units to allow accessibility by persons with disabilities;
- Replacing or renovating several public housing sites that have substantial unmet capital needs. Utilization of MTW funding, RAD and development flexibility is an essential component of these efforts;
- Establishing flexible homeownership initiatives that combine vouchers, soft second mortgages and family economic self-sufficiency components.
- Using MTW flexibility to fund housing subsidy for homeless families entering into an employment program.

HABC will continue to pursue this long term vision – and identify new ways to utilize MTW flexibility in support of the MTW statutory objectives - over the ten-year term of the new MTW Agreement.

II. General Housing Authority Operating Information

This section of the Annual Plan provides required information on HABC's current inventory, projected leasing activities and waiting lists for both the Public Housing and HCV programs. It includes details on planned changes to the housing stock as a result of new development, and demolition and disposition efforts. Additional data regarding the general operation of HABC's programs can be found in Appendix H. Planned significant capital expenditures are also summarized in this section.

A. Public Housing Inventory

Current Leasing - All HABC public housing units are included in the MTW Block Grant. As of December 31, 2013, 15,146 units are under an Annual Contributions Contract (ACC) with the Department of Housing and Urban Development, 10,860^[1] of which are available for occupancy. As a total of 10,293 households currently reside in public housing – HABC's adjusted occupancy rate is 95%^[2]. Because of the MTW Agreement requirement to submit the Annual Plan 75 days prior to the end of the fiscal year, the numbers provided as of December 2013 serve as a proxy for its anticipated inventory at the beginning of the year.

Projected leasing - HABC's projected adjusted occupancy rate for MTW public housing inventory and leasing as of June 30, 2015 is 97.0%. The total number of MTW public housing units to be leased as of June 30, 2015 is 10,534. HABC anticipates that its adjusted occupancy rate will slightly decrease from last year (from 97.2% to 97%) primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations. In addition, HABC anticipates the number of move-outs to increase due to the anticipated opening of the housing choice voucher waitlist and is planning for a higher number of transfers to accommodate commitments under the Bailey Consent Decree.

Demolition/Disposition of Public Housing Units – During Fiscal Year 2015, HABC anticipates changes to its existing public housing inventory as a result of acquisition/development of units in the mixed finance portfolio and the demolition or disposition of obsolete units. The matrix entitled "Planned New Public Housing Units to be Added During the Fiscal Year", identifies 69 public housing (ACC) units projected to be added to the public housing inventory in FY 2015

Fifty (50) of the 69 ACC public housing units will be acquired under the Revised Hollander Ridge Revitalization Plan which was approved by HUD on September 24, 2012 in the FY2013 MTW Annual Plan. To date, HABC has not yet requested a project number for these units. Pursuant to Fair Housing Laws, at least five-percent (5%) of the units acquired under the Hollander Ridge Revitalization Plan will be 504 compliant. Once the units have been acquired and an assessment completed, HABC will determine which units will be modified to comply with UFAS.

^[1] Available for occupancy figures exclude units that are vacant and exempt consistent with 24 CFR 901.5. These exempt units include units: a) undergoing or identified to undergo renovation and/or vacated due to consent decree mandated alterations; b) undergoing or identified to undergo modernization; c) approved for deprogramming (disposition or demolition); d) approved for non-dwelling purposes; e) lost due to reconfiguration

^[2] Adjusted occupancy rate reflects the percentage of units that are available for occupancy that are actually occupied.

HABC projects that a total of 1,640 RAD and non-viable, obsolete units will be dispositioned and/or demolished from the public housing inventory during FY 2015.

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Number	Name and	Bedroom Size							Total Units	Population Type*	# of UFAS Units	
		0	1	2	3	4	5	6 +			Fully Accessible	Adaptable
MD002/TBD Scattered Sites - UFAS		0	0	3	16	0	0	0	19	Non-elderly disabled	19	0
MD002/TBD Hollander Ridge Replacement Units		0	10	10	25	5	0	0	50	General	5	0

Total Public Housing Units to be Added

69

Other Population Type:

n/a

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0201 Scattered Sites	130	Long-term vacant units of distressed obsolete housing; 129 units will be conveyed to the City of Baltimore; and 1 long-time vacant unit located at 611 N. Castle Street will be sold for fair market value to Johns Hopkins University Bloomberg School of Public Health to create a community garden accessible to the faculty, staff, students and the neighborhood..
MD002/Various See Appendix M	1,510	Several mixed-population sites in HABC's inventory will be placed in the Rental Assistance Demonstration Program (RAD) in FY 2015
MD002/0009	0	In FY 2015 HABC plans to re-submit an application for 0.3 acres located in O'Donnell Heights. The first application to HUD approved HABC's proposed use of 9.07 acres but denied HABC's planned use of the remaining 0.3 acres in the application. HABC will seek HUD approval of the remaining 0.3 acres.
N/A	0	N/A

Total Number of Units to be Removed

1,640

B. Section 8/Housing Choice Voucher Inventory

As of December 31, 2013, HABC's existing Section 8 Housing Choice Voucher leased housing inventory includes 14,144 MTW units (11,812 regular program units; 2,332 Thompson units) and 1,156 non-MTW units. By the end of the current fiscal year, these figures are projected to increase to 15,743; 12,200 total regular program units; 2,332 Thompson units and 1,211 non-MTW units

respectively. Table 1 shows leasing levels as of December 31, 2013 and projected leasing levels as of June 30, 2014. For MTW vouchers, from June 2013 to December 2013, including Thompson voucher activity, there was a net increase of 267 HCV leased households (HABC leased 88 more units under the regular program and leased 179 more units under Thompson).

Under its ACC, HABC's funding limits the number of households for which assistance could be made available to no more than approximately 12,200. As of December 2013, HABC has contract authority under the ACC to issue 18,579 MTW vouchers (excluding Thompson), and a total of 1,319 non-MTW vouchers; however, available HUD funding does not support this level of leasing for MTW vouchers. It is important to note that neither the HABC nor any other HCV administering agency is funded based on 100% of the ACC funding levels. The FY2005 Consolidated Appropriations Act changed the method and formula for allocation of HAP funds. The number of ACC authorized vouchers reflects the maximum number of families which may be assisted if adequate funds are provided by HUD.

**Table 1:
Housing Choice Voucher Program Inventory and FY 2014 Projected Leasing**

	Actual Leased as of 12/31/13	Projected Leased as of 6/30/14
MTW Tenant Based Vouchers (Non Consent Decree)	9,342	9,785
MTW Project Based Vouchers (Non Consent Decree)	1,041	1,090
MTW Tenant Based Vouchers - Bailey*	965	905
MTW Project Based Vouchers – Bailey	302	420
<i>Sub-Total</i>	<i>11,812</i>	<i>12,200</i>
MTW Tenant Based Vouchers – Thompson	1,788	1,788
MTW Project Based Vouchers – Thompson	544	544
<i>Sub-Total</i>	<i>2,332</i>	<i>2,332</i>
TOTAL MTW VOUCHERS	14,144	14,532
Non-MTW Section 8 Moderate Rehab	335	350
Non-MTW Section 8 New Construction/Substantial Rehab	596	596
Non-MTW VASH Vouchers	225	265
<i>Sub-Total</i>	<i>1,156</i>	<i>1,211</i>
TOTAL ALL	15,300	15,743

The total number of Bailey vouchers for non- elderly disabled (NED) households receiving assistance under the tenant-based program as of December 31, 2013 is 965. HABC is obligated to provide assistance to 850 Non-Elderly Disabled households as under the Bailey Consent Decree.

HABC has also applied for and received special purpose vouchers in the following amounts: Family Unification Program Vouchers, 100; Non-Elderly Disabled Category II Vouchers, 40; Veterans Affairs Supportive Housing Vouchers, 305.

HABC will be working closely with its partners, providers, and property owners/managers to utilize the current wait list and to fill all vacancies in a timely manner.

New Housing Choice Vouchers to be Project-Based During the Fiscal Year

Property Name	Anticipated Number of New Vouchers to be Project-Based	Description of Project
4227 Frederick Avenue	9	This nine-unit building located in the Irvington neighborhood will be designated for non-elderly persons with disabilities (NEDS). All nine will be one-bedroom units.
Biddle Street Residences	5	This six-unit building located in the Mid-Town Belvedere neighborhood will have 5 units designated for NEDS. All five (5) will be one-bedroom units.
Orchard Ridge Phase 4	20	Phase 4 of Orchard Ridge features 64 affordable townhomes in the Claremont Freedom neighborhood. Twenty of those townhomes will be project-based with 14 units designated for NEDS (all 14 will be one-bedroom units); and 6 units designated as Long-Term Affordable (LTA) UFAS (3 two-bedrooms and 3 three-bedrooms)
Penn Square 2	15	This 61-unit building in Penn North will have 15 project-based units. Twelve will be one-bedrooms units designated as LTA for NEDS; while the remaining 3 units will all be three-bedrooms designated as LTA-UFAS.
Manor South	14	This is a 90-unit building in the Glen neighborhood with 14 project-based units designated for NEDS. All 14 will be one-bedroom units.
Brexton-Chase Residences	7	This 10-unit building in the Mt. Vernon neighborhood will have 7 units designated for NEDS. All seven will be one-bedroom units.
Dorchester Residences	10	This is a 14-unit building in the Gwynn Oak neighborhood. Ten (10) units will be designated for NEDS. All 10 will be one-bedroom units.
Poppleton 3	10	This is a 32-unit building located in the Poppleton neighborhood. Ten of the 32 units will be project-based with 7 designated as LTA for NEDS (all one-bedrooms); and 3 units designated as LTA-UFAS (one two-bedroom and two three-bedrooms).
O'Donnell Heights	39	Phase 1-A at O'Donnell Heights consists of 76 units in the O'Donnell Heights neighborhood 39 of which will be project-based. Of the 39 units 12 will be designated as LTA NEDS (all 12 will be one-bedroom units) and 4 units will be designated as LTA-UFAS (1 two-bedroom, 2 three-bedrooms, and 1 four-bedroom).

Anticipated Total
New Vouchers to be
Project-Based

129

Anticipated Total Number of
Project-Based Vouchers
Committed at the End of the
Fiscal Year

Anticipated Total Number of
Project-Based Vouchers Leased
Up or Issued to a Potential Tenant
at the End of the Fiscal Year

755 (105 LTA-NEDS;
526 PBV-NEDS)

684 (86 LTA-NEDS;
383 PBV-NEDS)

Additionally, the City has supported additional projects that propose the use of HOME and LIHTC funding. If any of the projects are awarded by the State of Maryland in March of 2014 then there may be up to an additional 59 Project-Based Vouchers in FY2015.

Other Changes to the Housing Stock Anticipated During the Fiscal Year

Vacant units at the eleven (11) mixed-population developments scheduled for RAD conversion in FY 2015 will be held off-line for the temporary relocation of existing residents. In addition, HABC anticipates that its adjusted occupancy rate will slightly decrease from last year (from 97.2% to 97%) primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations. In addition, HABC anticipates the number of move-outs to increase due to the anticipated opening of the housing choice voucher waitlist and is planning for a higher number of transfers to accommodate commitments under the Bailey Consent Decree.

General Description of All Planned Capital Fund Expenditures During the Plan Year

Installing new heating and cooling systems, Electrical distribution and steam and gas line repairs, development of replacement housing, REAC site improvements, replace roofs, construction of 68 rental units at O'Donnell heights, (now known as Key's Pointe), development of 76 LIHTC and Section 8 units, the Thompson Enhanced Leasing Assistance Program, 66 new construction UFAS units, technical and non-technical salaries and benefits, consultant fees, relocation, management improvements resident anti-drug program, affordable homeownership, sub-metering maintenance and service, debt service and environmental related testing, improvements and training.

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:

Federal MTW Public Housing Units to be Leased
Federal MTW Voucher (HCV) Units to be Utilized
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs

Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
10,534	126,408
*14,532	174,384
**66	792
25,132	301,584

Total Households Projected to be Served

*Includes 213 MTW Bailey and HABC Long-Term Affordable Project-Based Voucher units.

**These are units for which HABC provides subsidy only to house homeless families under The Journey Home (30 Units), and The Front Door (36 units) programs.

Reporting Compliance with Statutory MTW Requirements

HABC is in compliance with statutory MTW requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program

Public Housing
Local Non-Traditional
The Housing Choice Voucher Program

Description of Anticipated Leasing Issues and Possible Solutions

HABC anticipates that its adjusted occupancy rate will slightly decrease from last year (from 97.2% to 97%) primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations. In addition, HABC anticipates the number of move-outs to increase due to the anticipated opening of the housing choice voucher waitlist and is planning for a higher number of transfers to accommodate commitments under the Bailey Consent Decree..
In FY 2014 HABC partnered with the Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless); and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program that will rapidly house 60 homeless families for nine months. Since that time deliverables have been modified to rapidly house 36 homeless families for up to one year.
Under its ACC, HABC's funding limits the number of households for which assistance can be made available to no more than approximately 12,200. The requirement for additional project-based units under the Bailey Consent Decree will require a decrease in tenant-based voucher holders or an increase in funding or both. Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2014 and 2015 is an additional contributing factor in determining projected utilization. HABC anticipates that its leasing rate will decrease primarily due to budgeting concerns and the effects of the sequestration and future appropriations.

C. Waiting List Information

HABC maintains its waiting list in conformance with the policies described in the Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Program Administrative Plan. As of December 31, 2013, there are a total of 37,134 applicants for HABC's programs including: 26,668 public housing-only applicants; 7,551 HCV-only applicants; and, 2,915 applicants on both the public housing and HCV waiting lists. Demographics on current waiting list households are included in Appendix H.

The Housing Choice Voucher Waiting List

The HCV tenant-based waiting list is currently closed; and the Project Based wait list for non-elderly disabled persons (NEDs) is closed. However, the Project-Based Senior Citizen wait list is now open and will close on June 30, 2014. The Public Housing waiting list also remains open. By the end of FY 2014, HABC will have completed a partial update of the Public Housing waiting list. It is expected that a significant number of households may not respond to HABC's correspondence, thus potentially reducing the overall number of waiting list applicants. HABC will reopen the HCV waiting list as necessary to ensure that there are adequate numbers of applicants for available vouchers over a twelve-month period.

The Thompson Waiting List

Pursuant to the *Thompson* Settlement Agreement, the waiting list for *Thompson* Vouchers is maintained separately from any other waiting list for housing assistance, including HABC's waiting list. Application for, receipt of, or termination of a *Thompson* Voucher will not affect a family's standing on any other waiting list. A copy of the waiting list procedures for the *Thompson*-related programs is described in the Special Administrative Plan as Appendix II in the HABC HCV Administrative Plan. As of December 31, 2013, there were 4,509 families on the waiting list for *Thompson* Vouchers. , As of the same date 3,466 families were waiting for enrollment in the pre-placement counseling program and 841 families were enrolled in that program.

Units Created for Non-elderly Persons with Disabilities

HABC may require that units created for non-elderly persons with disabilities and subsidized by funding other than the use of Housing Choice Vouchers, (such as Section 811 funds, Shelter Plus Care vouchers and Supportive Housing Program grants), be tenanted only by non-elderly persons with disabilities with active applications on HABC's HCVP waiting list. In these cases, property management of included units will request and receive referrals from HABC and will be required to offer tenancy to persons meeting site eligibility requirements in the order in which names appear on the referred list.

For the purposes of meeting its obligations under the Bailey Consent Decree these units will be counted toward the total number of required project-based units. An HABC-referred person who accepts an offer of tenancy at one of the included units will have his/her HCVP application placed in an inactive status for a minimum of one year from the date of occupancy of the unit. At the end of that period, the applicant may request reactivation of his/her application. HABC will then reactivate the application with its original application date. While this change to our waiting list policy and procedures does not require any additional MTW flexibilities, it was included in Volume 2 of the FY 2011 Annual Plan (the HCV Administrative Plan), Chapter 20.

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Program: Tenant-Based	Community Wide	14	Closed	Yes. HABC will open this waiting list during FY 2015
Federal MTW Housing Choice Voucher Program: Project-Based	Site-Based	6,707 (Project-Based, Moderate Rehab & PB Senior)	Partially Open	Currently the project-based senior citizen wait list is open but will close on June 30, 2014.
Federal MTW Public Housing Units	Community Wide	28,538	Open	N/A
Federal Combined Programs Waiting List	Community Wide	2,017	The Public Housing waiting list is open; the HCVP waiting will open in FY 2015.	The Public Housing wait list is open. The HCVP tenant-based waiting list will be opened in FY 2015.

For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open:

The MTW Public Housing and HCVP Waiting List is for applicants who have applied for both programs prior to the closing of the HCVP Waiting List.

If Local, Non-Traditional Housing Program, please describe:

The Housing Choice Voucher local non-traditional programs (The Front Door and The Journey Homes) where HABC only provides subsidy, do not have waiting lists. Families are chosen from those living at the shelter that successfully completes an employment readiness program.

If Other Wait List Type, please describe:

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

D. Housing Stock Information

In Fiscal Year 2015, HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities. HABC projects it will expend a total of approximately \$60.5 million on capital activities in the coming year.

HABC has provided an update to the Asset Management Table in Appendix C which describes the current status of each public housing site, outlines certain risk factors that will be monitored over the life of the MTW Demonstration, and describes possible outcomes of these risks. It is designed to serve as the conceptual basis for current and future years' planning. As a result of our preliminary findings in HABC's portfolio wide asset review, we have updated the Asset Management table to identify sites where redevelopment, conversion, homeownership, management improvements and other activities may take place in the future; however, it is subject to periodic change based on priorities and available resources. It is important to note, that HABC will be participating in the Rental Demonstration Program (RAD). The properties approved for RAD, Phase I and Phase II are identified in the Asset Management Table. The removal of these properties from HABC inventory will result in a decrease in HABC's Capital Subsidy of approximately \$3.2 million over a two year period.

HABC notes that Housing Choice Voucher funds have been made available for capital activities to renovate long-term vacant units, to modify units for handicap accessibility and to improve physical conditions to ensure long term viability of existing inventory. Prior year allocations of Housing Choice Voucher funds are being utilized to complete planned activities in FY 15. Additional funds may also be made available in FY 15 for work items included in HABC's Long Term Capital Plan that contribute to the long term viability of our existing portfolio.

Additionally, other properties in HABC's portfolio which are not currently listed may, in the future, require MTW capital expenditures. HABC may elect to undertake these capital projects in FY 2015. It should be noted that some expenditures may take place in FY 2015 as a result of projects planned for and begun in FY 2013 and FY 2014, but completed and paid for in 2015.

HABC has let a number of contracts that were started in FY 2012 but will not be fully expended until FY 2015. These commitments are required in order to ensure that HABC meets its Consent Decree and MTW obligations and benchmarks.

Pursuant to the MTW Agreement, as mentioned above, HABC has combined all current and prior year Capital funds, including RHF funds, into the MTW Block Grant, with the exception of the Security and Safety Grant activities that will be carried out in accordance with all HUD regulations, including 24 CFR 905.951, 24 CFR 968, and other requirements applicable to the Capital Fund Program.

Appendix J includes the Capital Safety and Security Grant awarded for improvements at Cherry Hill Homes.

Spending Plan				FY'15
Year of Funding Award	AMP No.	Devel Name	Description of Work	Original Spending July 1, 2014 - June 30, 2015
FFY 12, 13, and 14	AMPs	AMPs	Debt service - Capital Fund Financing Program and Energy Performance Contracts	9,795,585
FFY 12, 13, and 14	AMPs	AMPs	Environmental Related Testing, Improvements and Training	300,000
FFY 12, 13, and 14	AMPs	AMPs	Submetering Maintenance and Service	30,000
FFY 12, 13, and 14	AMPs	AMPs	Affordable Home Ownership	8,746,438
FFY 12, 13, and 14	AMPs	AMPs	Resident Anti-Drug Program and Energy Related Activities	14,000
FFY 12, 13, and 14	AMPs	AMPs	Emergency Repairs to Mixed Population Buildings and other Properties as Needed	752,347
FFY 12, 13, and 14	AMPs	AMPs	Management Improvements, IT Software and Hardware	372,500
FFY 12, 13, and 14	AMPs	AMPs	Consultant Fees (Planning, Utility, Maintenance of Software, etc.)	140,000
FFY 12, 13, and 14	AMPs	AMPs	Relocation	46,563
FFY 12, 13, and 14	AMPs	AMPs	Technical Salaries	1,597,694
FFY 12, 13, and 14	AMPs	AMPs	Technical Salary Benefits	679,145
FFY 12, 13, and 14	AMPs	AMPs	Non-Technical Salaries	1,204,917
FFY 12, 13, and 14	AMPs	AMPs	Non-Technical Salary Benefits	415,803
FFY 12, 13, and 14	AMPs	AMPs	Sundry and Overhead Expenses	348,364
FFY 12, 13, and 14	11	Cherry Hill Homes	Install New Heating /Cooling System at Community Bldg/Day Care Center and Site Improvements	338,393

Spending Plan				FY'15
Year of Funding Award	AMP No.	Devel Name	Description of Work	Original Spending July 1, 2014 to June 30, 2015
FFY 12, 13, and 14	5	Douglas Homes	Electrical Distribution and Steam and Gas Line Repairs	5,176,268
FFY 12, 13, and 14	6	Gilmor Homes	Replace Sidewalks (REAC)	100,000
FFY 12, 13, and 14	45	Hollander Ridge	Development of Replacement Housing - 110 Units and Associated Costs	14,723,407
FFY 12, 13, and 14	1	Latrobe Homes	REAC Site Improvements, Sidewalks, Erosion Control and Roof Replacement	2,650,000
FFY 12, 13, and 14	2	McCulloh Homes	Replace Roofs	2,000,000
FFY 12, 13, and 14	9	O'Donnell Heights	Phase 1 B - Construction of 68 Rental Units - O'Donnell Heights Replacement Housing	900,000
FFY 12, 13, and 14	9	O'Donnell Heights	Development of 76 Low Income Housing Tax Credit and Section 8 Units	2,023,359
FFY 12, 13, and 14	3	Perkins Homes	Steam and Gas Line Repairs	4,057,065
FFY 12, 13, and 14	31	Rosemont	Gas Pipe Replacement	40,000
FFY 12, 13, and 14	200	Scattered Sites	Roof Replacement	300,000
FFY 12, 13, and 14	797	Scattered Sites	Enhanced Leasing Assistance Program	360,000
FFY 12, 13, and 14	124	TBD	Sixty Six (66) New Construction UFAS Units and Associated Costs	3,486,072
			GRAND TOTAL Excludes BOND, ResGrant and OPER)	60,597,920

504 Accessibility Improvements

In FY 2015, HABC will continue to: (i) modify existing units and sites to meet UFAS regulations; (ii) modify units to meet reasonable accommodation and immediate need requests; and (iii) modify common areas to meet UFAS regulations for providing public housing choices for low-income persons with disabilities.

To date 665 of 756 UFAS units have been created and certified under the Bailey Consent Decree. To meet HABC's obligations of 756 UFAS units under the Bailey Consent Decree, an additional 91 UFAS units must be created:

- 24 UFAS units are under construction in mixed-income developments and are expected to be certified in CY 2014;
- 35 UFAS units will be created by building on vacant lots that are owned by the City or HABC.
- 6 UFAS units to be created by LIHTC and HOME projects
- 26 Remaining UFAS units to be constructed

Security Camera Systems

Over the past few years, HABC installed Close Circuit Television ("CCTV") camera systems, which are a series of permanently mounted cameras, throughout HABC developments to monitor the exterior of several family developments. In FY years, 2011 and 2012, HABC through a Capital Safety and Security Grant installed an additional 11 exterior CCTV cameras at Gilmor, increasing Gilmor's cameras from 20 to 32. In FY 2012 HABC was awarded a second Capital Safety and Security Grant. The funds were used at Cherry Hill to replace 3 outdated CCTV cameras; install 1 new camera; and upgrade approximately 15 cameras to Gunshot Technology ("GST") – all cameras became operational in FY 14. HABC's overall CCTV cameras have increased from 167 to 180. These fixed exterior security cameras are currently installed at six family housing sites (Latrobe, Gilmor, Perkins, McCulloh, Pleasantview Gardens and Cherry Hill.). In FY 2015, the Baltimore City Police Department (BCPD) will continue to monitor the 180 exterior cameras and HABC has issued maintenance contracts with the City to insure their viability.

The mixed-pop buildings contain 259 CCTV cameras that are monitored by the building monitors. A feasibility study is underway to determine how to better manage the mixed-pop building's cameras and entrances. It is expected that a pilot program may be implemented in the last quarter of FY 2014 or by FY 2015.

The CCTV system has been effective, resulting in the reduction of crime in the family developments—especially drug-related crimes—as well as increasing success in prosecutions and lease enforcement. Because the CCTV system has an expandable infrastructure, HABC is pursuing the addition of CCTV equipment at other family developments as new funding sources are identified.

HABC has also installed fourteen (14) PODSS at various developments. PODSS are "flashing blue light", mobile-mounted exterior cameras that are easily relocated as needed. Strategic deployment of these camera units has been successful at interrupting and reducing criminal activity in targeted areas. The PODSS are outdated and it has been recommended by BCPD that the existing PODSS, except for the unit located at 20th Street should be eliminated. The results of these findings will be implemented in the last quarter of FY 2014 or by the first quarter of FY 2015.

Infrastructure and Extraordinary Maintenance

Major work scheduled for FY 2015 includes: the installation of a new HVAC system at the Community Room at Cherry Hill; the repair and replacement of steam lines in Perkins and Douglas; the repair and replacement of gas lines in Perkins and Douglas; the replacement of roofs systems at Latrobe, McCulloh Homes and various scattered sites; the upgrade of the electrical distribution system at Douglas Homes; the replacement of sidewalks and erosion control at Latrobe, Cherry Hill and Gilmor; and the renovation of long term vacant scattered sites.

HABC continues: work on the façade restoration work at Van Story Branch and Chase House: the replacement of roofs at Somerset Court Extension and various scattered sites; the investigation and repair of drainage and erosion problems at various sites; and the continuation of HABC's environmental program that includes the continued testing for lead based paint and abatement of asbestos as required and removal of underground fuel oil tanks when required, all of which will be completed by the end of FY 2014.

In FY 2015, HABC may: (i) continue to develop master plans which note physical areas of concern and a course of action to rectify them (landscaping, egress, hazards, etc.); (ii) address some concrete walkway issues; (iii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; (v) complete long term vacant units; and (vi) begin plans to eliminate erosion problems.

Energy Performance Contracting

HABC will continue Monitoring, Measurement and Verification efforts for the Phase I Energy Performance Contract (EPC) properties. (Latrobe, Cherry Hill, Gilmor, Westport and Brooklyn) A Phase III EPC Program is currently under review for installing conservation measures (lighting, water conservation fixtures, utility metering and system upgrades) at selected properties. If the feasibility studies warrant an EPC III, its installation should commence in FY 15.

Partnerships

HABC has partnered with the Department of Housing and Community Development's Weatherization Assistance Program ("WEP") and the Parks & People Foundation ("P&P") through a Memorandum of Understanding which allows both WEP and P&P to perform energy and storm water management projects on HABC sites at no cost to HABC. In the first quarter of FY 2014 WEP completed the weatherization of 22 units in McCulloh homes and in the last quarter of FY 2014 started a weatherization program for several scattered sites units in Johnson Square, which will be completed in the first quarter of FY 2015. In FY 2014 P&P completed a storm water management and erosion control project in a portion of Gilmor Homes and planted trees at several of HABC's family sites. In FY 2015, P&P is expected to receive several grants for storm water management projects at Perkins, Latrobe and Gilmor.

E. Neighborhood Development Activities and Expenditures

HABC's housing development accommodates four distinct strategies, which include MTW funds and proposed public and private leveraged funds. Each of the four strategies (Neighborhood Reinvestment, New Housing Production, Thompson Partial Consent Decree Production, and Bailey

Consent Decree Housing Production) is summarized below. As these projects are all in the development or pre-development stages, the final unit numbers and development approach may vary from those presented below.

Neighborhood Reinvestment

Under the Neighborhood Reinvestment Program, HABC works with private development partners and Baltimore neighborhoods to re-capitalize the distressed scattered site public housing stock in strengthening neighborhood markets, linking their redevelopment to a larger program of market-rate rental and for-sale production. The public housing component of these projects will result in a permanently affordable rental housing resource in improving neighborhoods, ensuring economic diversity. This program achieves the mixed-finance redevelopment of existing ACC (public housing) units. The narrative below describes FY 2015 goals and activities in this strategy area:

Barclay - HABC procured Telesis as its development partner in the redevelopment of the Barclay neighborhood. Telesis completed a redevelopment plan calling for the new construction and rehabilitation of approximately 322 mixed-income housing units. The first rental phase of 72 affordable units has been completed. The first affordable homeownership phase consisting of 20 rehabilitated units was completed in FY 2013 and sold to families making 120% of AMI. Construction of an additional 15 homeownership units has commenced in FY 2013 and will be completed in FY 2014.

Construction of Phase 2 of the project has begun and will be completed in FY 2015. This phase includes the demolition of the entire 400 block of E. 20th Street and the new construction of 69 affordable rental units on this site. The new units will be in a townhouse style design and will also include a small community center. A total of 11 units are being produced to provide housing opportunities for non-elderly persons with disabilities and 8 additional units are being produced for households that need accessible unit features. To date 10 units are occupied and construction is expected to be complete in the fourth quarter of 2014.

Phase 2 will also include the construction of a small park surrounded by 30 homeownership units on the 300 block of E. 20th Street. Construction of the park is expected to begin in the first quarter of FY15. Construction of the homes is expected to commence in FY 2015, with construction being completed in FY 2016. Two former public housing units will be disposed of to the developer for this phase of the project.

In addition, properties included in Phase 3 of the project along the 1900 and 2000 blocks of Greenmount Avenue will be demolished in FY 2014. Clearance of this site will enhance the adjacent Phase 2 site. The site will be greened as an interim use during FY 2014.

Johnston Square - Johnston Square is a part of a larger transformation that is taking place over a broad swath of the Central City beginning in EBDI and continuing to Barclay. The development strategy for Johnston Square is built from a strong base of assets including: existing concentrations of homeownership, prominent green and open spaces, St. Frances Academy, and nearby redevelopment activities such as Barclay, Oliver/Preston Place, and City Arts.

Mi Casa, Inc. has developed 30 units of affordable homeownership in the 700-800 blocks of E. Preston Street using Neighborhood Stabilization Program 2 funds. To date 6 of the 30 homeownership units have been sold to homebuyers.

New Housing Production Program

HABC's New Housing Production Program for mixed-income, mixed finance development involves the complete transformation of distressed sites. In FY 2013, HABC will continue to sponsor significant mixed-income residential development at several locations across the City, resulting in a variety of housing choices for low-income households in the city.

Uplands – The City of Baltimore acquired the 52-acre Uplands Apartments site from HUD in January 2004 through a foreclosure auction with the intent of developing a new mixed income neighborhood. Baltimore City's Housing and Community Development agency (HCD) completed a Master Plan that calls for the development of 1,146 new units, of which 611 mixed income units will be located on the 52-acre site. An additional 150 market rate units will be located on the Westside Skills Center parking lot and the "Triangle" parcels that were acquired and incorporated in the development parcel. .

The developer applied for and received a LIHTC allocation for the first rental phase of the project, consisting of 104 units. Sixteen of these units are dedicated to non-elderly persons with disabilities (NEDs) and 12 for units that meet the Uniform Federal Accessibility Standards (UFAS), six (6) of which are designated as long term affordable UFAS under HABC's Bailey Consent Decree. The construction of the first rental phase was completed and fully occupied by the third quarter of FY2013.

HABC has provided 62 Project Based Vouchers (PBV) for the returning residents, NEDS and UFAS units. A Settlement Agreement between the former Uplands residents and the City of Baltimore was reached and approved by the US District Court. The agreement requires 74% of the homes to be rented and sold to families with incomes at or below 115% of the AMI and 26% of the homes to be rented and sold at market rates. The first homeownership phase is under construction and consists of approximately 178 units, of which 30 units have been constructed and 18 units sold. There are fifteen (15) units under construction and are projected to be completed and sold in FY14. In FY 15 it is projected that approximately 31 homeownership units will begin construction with approximately 43 of the 178 units sold.

Orchard Ridge (formerly Claremont/Freedom) – In FY2015 HABC expects that Habitat for Humanity of the Chesapeake will complete the construction of the 30 remaining affordable homeownership units in Phase I. Habitat has completed 15 of the 30 units in August 2013 with the remaining 17 units to be completed by 2015.

Pennrose Development has commenced construction on Orchard Ridge Phase IV, a 64 unit development located on the vacant parcels within the community. The new units will provide one, two, and three bedroom affordable townhouses and stacked units to individuals and families with incomes up to 60% of the AMI. Pennrose has received Low Income Housing Tax Credit s(LIHTC) and HOME funds to subsidize the construction costs. Construction has commenced and anticipates to be completed by the second quarter of FY2015.

O'Donnell Heights – O'Donnell Heights was constructed in 1942 and included 900 public housing units. Of these, 596 have been demolished over the last several years and 304 remain on-line. The plan for the 62-acre site is for the demolition of the remaining housing units and the creation of a 925-

unit mixed income residential community to include the replacement of public housing units on site. The redevelopment of O'Donnell Heights is to be completed in multiple phases over the next 10 years. Through a competitive Request for Qualifications, the team of Michaels Development Company and AHC Greater Baltimore was selected by HABC as the developer for the O'Donnell Heights redevelopment.

Phase I of the redevelopment includes 144 rental and 7 homeownership units to be completed in two sub-phases, Phase I-A and I-B. In a letter dated August 16, 2012, HUD approved the disposition of approximately 9.1 acres, encompassing the 144-unit rental portion of the Phase I site area.

Phase 1-A, consisting of 76 residential units, including one manager's unit is underway and will be completed before the end of FY 2014. HABC has provided 39 project based vouchers for returning residents, NEDS and UFAS units. The remaining 36 rental units are affordable to households earning less than 50% of the AMI.

The "Long Term Affordable Project Based Units" or "LTA-PB Units" were created at O'Donnell Heights. Twenty-seven of the thirty-nine LTA-PB Units were made available to eligible current and former O'Donnell Heights residents ("Returning Residents"), four (4) of which are UFAS units being offered to residents on the Reasonable Accommodation Transfer Waiting List who need the features of a UFAS unit. In order to allow Returning Residents to get priority for the four (4) UFAS units HABC created a preference on the Reasonable Accommodations Transfer Waiting List for the Returning Residents. Transfers that are approved as a reasonable accommodation due to a disability are defined as:

- Transfers needed to address an immediate need, as this term is defined in the consent decree entered in *Bailey v. HABC* (JFM-02-CV-225) and *United States of America v. HABC* (JFM-04-CV-3107)¹ (the Bailey Consent Decree). Immediate needs transfer requests receive priority over other reasonable accommodation transfer requests.
- Transfers requested to allow a person in the resident's household to live in an accessible unit or a unit that contains features that make the unit usable for a person with a disability;
- Transfers requested to allow a person in the resident's household with a verified disability to fully access and utilize the public housing program and related services;
- Transfers requested to allow a person in the resident's household with a verified disability to live closer to a required treatment center, or closer to transportation in order to get to a required treatment center.

¹ Immediate Needs families are families who have a household member with a disability that: lacks access to a toilet; lacks access to a shower or a bathtub that can be used by a person with a disability; lacks access to the kitchen unless the person with the disability is a minor child under age 8 years; lacks access to a bedroom; lack access to a bedroom occupied by a minor child/children for whom the person with a disability provides supervision or has child care responsibilities; lacks the ability to enter or exit the unit without assistance; or is at a substantial health risk, as verified by a health care professional, due to the conditions of the current unit. Please note that "physical accessibility" is not the only trigger for having an Immediate Need. Immediate Needs families are not required to supply disability verification and are to be referred immediately to the Housing Operations 504 Program Manager.

The specific procedures to process transfer made as a request for a reasonable accommodation due to a disability can be found in Chapter 8 of the Public Housing Admissions and Continued Occupancy Policies (ACOP) available on HABC's website at:

http://static.baltimorehousing.org/pdf/acop_2014.pdf

The LTA-PB Units shall be managed and operated primarily in accordance with HUD regulations governing public housing units (*e.g.*, 24 CFR Parts 5, 960, 966, and the like) (the "Public Housing Regulations"), even though the LTA-PB Units will be subsidized with project based voucher funds. The LTA-PB Units shall remain affordable for a minimum of forty (40) years.

The second part of Phase I, identified as Phase I-B will be part of a LIHTC application to be submitted to the Maryland Department of Housing and Community Development near the end of FY2014. HABC plans to leverage banked Replacement Housing Factor funds in FY 2015 for construction of the mixed finance development known as Phase 1-B which is expected to begin in the fourth quarter of FY2015. Phase 1-B will consist of 58 units, 36 of which will be LTA-PB Units made available to eligible current and former O'Donnell Heights residents ("Returning Residents"), and two (2) of which will be UFAS units.

Thompson Partial Consent Decree Production

To meet the public housing unit production requirements of the *Thompson* Partial Consent Decree HABC is undertaking the following:

Project-Based Development Program - Additionally, under the *Thompson* Settlement Agreement, BRHP is continuing the project based development program that was started under the *Thompson* partial consent decree. As a subcontractor to BRHP, MBQ is implementing a project based development program to create project based units in non-impacted areas. Subject to funding availability, MBQ is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294) available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts. Under this initiative, MBQ has placed 20 units in the Hilltop development project under AHAP. MBQ's goal is to create up to 120 scattered site project based units in addition to the units in the Hilltop development project during fiscal years 2014 and 2015.

Bailey Consent Decree Housing Production

In order to meet its obligations under the Bailey Consent Decree, HABC may devote Housing Choice Voucher (HCV) funds available as part of the MTW Block Grant to the production of units that will benefit from Project Based HCV vouchers, ACC payments, or that otherwise meet the requirements of the Bailey Consent Decree. In previous years, HABC has offered up to \$30,000 per NED unit of "gap financing" for new construction or rehabilitation projects that could not meet funding requirements through conventional means. The funds were for NED units that met the requirements of the Bailey Consent Decree. It also offered up to \$10,000 per NED unit for existing projects that set aside units that met the Bailey requirements. HABC may make such offers again or may use various other options, including payments, loans or grants to cover costs of converting units to meet UFAS requirements and providing financial incentives to developers to reserve units for non-elderly disabled residents.

Sources of funding for such payments, loans, grants and incentives could include City funds, HCV funds, and other discretionary funds available to HABC.

Incentives for NED and UFAS Units – Developers seeking support from HABC and Baltimore City for LIHTC must agree to set aside at least 15% of the LIHTC units for non-elderly persons with disabilities (NED), and 5% of the units UFAS compliant in order to obtain that support (this is in addition to the 5% UFAS compliant units as mandated by law). Developers proposing new construction or rehabilitation and who receive certain federal capital funds must make at least 15% of the units for non-elderly persons with disabilities and 5% of the units UFAS compliant (this is in addition to the 5% UFAS compliant units as mandated by law). In FY 2009 as an incentive to developers to create more than the units already required for non-elderly persons with disabilities and more than the required UFAS compliant units, HABC began offering, via HCD's request for proposals (RFP) associated with LIHTC support and HOME funds, capital funds to developers who agree to create in excess of 15% of the LIHTC units for non-elderly persons for disabilities and/or in excess of the 5% of the units as UFAS compliant. The offer was also made by HABC to developers and apartment unit owners that would take Project Based HCVs and participate in either the NEDs or UFAS programs. In order to maximize the effectiveness of the RFP, HABC may expand upon the current offer in FY 2015 with additional funding, may amend the offer in other ways, or may cancel the offer entirely.

The State, however, is in the process of reviewing its Qualified Allocation Plan (QAP), which governs the issuance of LIHTC. It is possible that the new QAP will not require local government support of LIHTC developments. This could impact HABC's ability to require NED and UFAS units in LIHTC developments. Currently, the new QAP is still in process. HABC will take what steps that it can in order to continue to obtain Bailey Consent Decree units through the LIHTC process.

Housing for Persons with Disabilities – HABC will offer to combine capital funds made available from HCV or public housing funds with other subsidies to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. The funds are being made available under HABC's RFP described above. HABC may amend this offer as circumstances change or may cancel it entirely.

New Construction Scattered Site Units –HABC intends to construct approximately 60 UFAS compliant homes for persons with mobility impairments in order to meet the requirements of the Bailey Consent Decree. The units will be located throughout various neighborhoods within Baltimore City. To date HABC has awarded contracts to residential builders in two phases. Phase I development consist of 16 UFAS units, construction is planned to be completed by January 2014. Phase II development consist of 13 UFAS units and construction is expected to be completed in August 2014. Phase III consist of 6 units, however, at this time awarding is pending the Board of Commissioner's approval. HABC will continue its effort to identify lots for UFAS units in FY2014. HABC is currently in the planning stage for Phase IV which may consist of a small apartment building of up to 10 UFAS units.

Other Development Activities

HABC is considering development of a number of other sites. Activities on these sites in FY 2014 could include master planning, the issuance of RFPs or RFQs, the execution of Land Disposition or Master Development Agreements, the provision of MTW funds to developers, demolition, site clearance, and remediation, and other pre-development and development work.

Choice Neighborhoods Initiative – HABC is considering applying for a Choice Neighborhoods Initiative planning grant in FY 2015. Potential community sites include, but are not necessarily limited to, Perkins and Douglas Homes. The planning grant would be used to refine existing plans for physical redevelopment, coordinate with service providers, government agencies and others to create a network of partners to meet the grant requirements, and to lay the groundwork for an implementation grant request.

Rental Assistance Demonstration –HABC applied to HUD under the Rental Assistance Demonstration (RAD) for the rehabilitation and conversion of twenty-four (24) public housing projects. The RAD program allows housing authorities to convert public housing funding associated with a development to housing choice voucher (HCV) funding and, at the same time, dispose of the property from the public housing inventory in order to use the funding for debt service payments. Staff will be working with third-party developers on development plans, financing applications and in bringing twelve projects to successful closing by end-of-year 2014. The projects in process are: Bel Park Tower, Lakeview Tower, The Allendale, Bernard E Mason Sr., Apts, Hillside Park, Hollins House, Primrose Place, McCulloh Ext, Pleasant View Gardens, Somerset Court, Pleasant View Gardens and Wyman House.

HABC has a backlog of up to \$800 million of capital needs and an inadequate amount of capital funding. By converting a development to HCV funding and leveraging private debt and low income housing tax credits, it is possible to rehabilitate the building for the long term without displacing any of the existing residents. The HCV subsidy would replace the ACC contract subsidy. Tenants' rights would be largely the same and tenants would have the benefit of receiving a tenant-based housing choice voucher after one year of occupancy in good standing at the tenant's option.

Somerset Homes – HABC has worked with the City of Baltimore's Planning Department, community organizations, as well as, resident stakeholders to develop a Master Plan for the redevelopment of the Orleans to Fayette Street corridor (the "Old Town Mall" area). The redevelopment area is approximately 16 acres and includes the distressed Somerset Homes site along with an 8.3 acre parcel of City-owned land called the Oldtown Mall area that sits adjacent to the Somerset Homes site. A final master plan was completed in FY 2010 and HABC commenced planning efforts for the redevelopment of the Somerset site and the adjacent property in FY 2011. In FY 2014, HABC intends to offer a Joint Request For Proposals with the Baltimore Development Corporation (BDC), the entity in control of the adjacent 7.5 acres of City-owned property. BDC is the City's economic development arm. HABC expects that the combination of the two parcels would allow for a more attractive development opportunity with synergies for a mixed income, mixed use development. The selection of a developer is projected to occur in FY 2015 while HABC plans to submit a Disposition Application to HUD to dispose of the Somerset Homes site to the selected developer in FY 2016.

The Old Town Mall Master Plan generally calls for mixed-use and mixed-income housing development and HABC expects to replace the former Somerset units with a mix of low income, affordable and market rate housing. It is the goal of this mixed-finance development to provide one-third of the units as public housing units in the residential mix along with some commercial and retail development over the total development site (Somerset Homes and Oldtown Mall).

Hollander Ridge HOPE VI Funding –Approximately \$18.85 million of HOPE VI funds that were originally designated for the redevelopment of the Hollander Ridge site are available. HABC intends to use these funds to acquire and rehabilitate properties that will be replacement housing for both

former Hollander Ridge residents and former or current O'Donnell Heights residents. The properties will be scattered-site units in areas of Baltimore City identified in the Thompson Settlement Agreement.

In satisfaction of the Thompson Settlement Agreement, HABC will also make available the equivalent of \$7,140,000 ("Replacement Funds"). The Replacement Funds may be used in conjunction with FY 1996 HOPE VI Funds originally awarded to HABC for Hollander Ridge ("HOPE VI Funds") to develop one or more scattered site projects totaling approximately 110 units. The Replacement Funds may be from any available source including, but not limited to, low income housing tax credits, the State Partnership Rental Housing Program, other State housing funds, low income housing bond funds, private debt or equity, public housing funds or MTW funds. However, the Replacement Funds may not be taken from the HOPE VI Funds.

Plans for this acquisition project include augmenting the Hollander Ridge funds with low income housing tax credits or other moneys to expand the scope of the project. HABC has had discussions with both the O'Donnell Heights Tenant Council and the ACLU regarding this plan. HABC selected a development team in May 2013 to carrying out the development plan in FY2014 consisting of at least 50 units. The remaining 60 units are planned for development in FY2016.

The Towns at the Terraces – HABC may begin development activities for the balance of undeveloped land in the Towns at the Terraces. At completion, the project left a large, vacant parcel bordering on Martin Luther King Jr. Drive surrounded by new townhouses. HABC may hold charettes or conduct a planning process, issue a Request for Qualifications or a Request for Proposals in connection with the site, conduct land use, environmental, or other studies, solicit and contract for a market study, undertake remediation activities, or in general perform any other activities it deems necessary in connection with the development of the site.

Other Developments – HABC may use its public housing or Housing Choice Voucher resources for other developments throughout the City as opportunities arise

Homeownership Programs

In addition to the Thompson Homeownership Demonstration Program and various homeownership activities planned or underway as part of HABC development efforts as discussed above, HABC will continue to implement two programs to encourage first-time homeownership by eligible low-income households:

MTW Homeownership Program – Using its MTW flexibility, HABC submitted a revised MTW Homeownership Plan, which was approved by HUD in 2009. While stricter guidelines imposed by lenders have reduced the number of public housing participants who are eligible to purchase a home, HABC will continue its efforts to assist new homeowners. Under the Plan, HABC will identify and rehabilitate various vacant scattered sites properties for homeownership sale to eligible residents.

Housing Choice Voucher Homeownership Program – As of December 31, 2013, 76 homes have been purchased by participants in the Housing Choice Voucher Homeownership Program (HCVHP) with 63 participants still in the program. HABC's goal in FY 2015 is to assist an additional eight (8) families so that the projected total number of homes purchased under the HCVHP will be 84 by June 30, 2015. Continuing uncertainty regarding the housing market and availability of mortgages for low-income families could significantly impact this goal.

F. Leasing Information – Planned

Public Housing Projected Leasing

HABC's projected adjusted occupancy rate for MTW public housing inventory and leasing as of June 30, 2015 is 97.0%. The total number of MTW public housing units to be leased as of June 30, 2015 is 10,534. HABC anticipates that its adjusted occupancy rate will slightly decrease from last year (from 97.2% to 97%) primarily because of the uncertainty in allocations of funding to the housing operations division, and future appropriations. In addition, HABC anticipates the number of move-outs to increase due to the anticipated opening of the housing choice voucher waitlist and is planning for a higher number of transfers to accommodate commitments under the Bailey Consent Decree.

Section 8/Housing Choice Voucher Program Projected Leasing

Table 3 provides a summary of HABC's Tenant-based and Project-based MTW Housing Choice Voucher programs including current leasing rates and projected leasing through June 30, 2015. Also included are non-MTW units under the VASH, Moderate Rehab, Substantial Rehab and New Construction programs, and HUD Opt-Outs for Memorial Apartments (229).

**Table 3:
Housing Choice Voucher Program FY 2015 Projected Leasing**

	Projected Leased as of 6/30/14	Projected Leased as of 6/30/15
MTW Tenant Based Vouchers (Non Consent Decree)	9,647	9,660
MTW Project Based Vouchers (Non Consent Decree)	1,090	1,100
MTW Tenant Based Vouchers – Bailey	905	900
MTW Project Based Vouchers – Bailey	420	450
<i>Family Unification Program (FUP)</i>	<i>98</i>	<i>100</i>
<i>Non-Elderly & Disabled, Category II (NEDs Cat II)</i>	<i>40</i>	<i>40</i>
<i>Sub-Total</i>	<i>12,200</i>	<i>12,250</i>
MTW Tenant Based Vouchers – Thompson	1,788	1,788
MTW Project Based Vouchers – Thompson	544	544
<i>Sub-Total</i>	<i>2,332</i>	<i>2,332</i>
TOTAL MTW VOUCHERS	14,532	14,582
Non-MTW Section 8 Moderate Rehab	350	350
Non-MTW Section 8 New Construction/Substantial Rehab	596	596
Non-MTW VASH Vouchers	265	305
<i>Sub-Total</i>	<i>1,211</i>	<i>1,251</i>
TOTAL ALL	15,743	15,833

Under its ACC, HABC's funding limits the number of households for which assistance can be made available to no more than approximately 12,250 at the end of FY 2015. The requirement for additional project-based units under the Bailey Consent Decree will require a decrease in tenant-based voucher holders or an increase in funding or both.

Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2014 and 2015 is an additional contributing factor in determining projected utilization. HABC anticipates that its leasing rate will decrease primarily due to budgeting concerns and the effects of the sequestration and future appropriations. In addition, the requirement for additional project-based units under the Bailey Consent Decree will require a decrease in tenant-based voucher holders or an increase in funding or both.

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2015.

A. Leased Housing Proposed MTW Activities

Beginning in FY 2015, HABC proposes to implement the new MTW activities described below. As required by HUD, the following information is provided:

- Activity description
- Activity Metrics Information
- Need/Justification for MTW Flexibility
- Additional Information (rent reform activities)

19. Energy Conservation Utility Allowance

Description of MTW Activity: HABC provides utility allowances for households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. HABC will conduct outreach to HCV landlords and tenants, where the household is responsible for payment of the water/sewer utility, to notify them of a locally funded opportunity to have a water audit conducted in their unit. Water audits will be conducted by the Department of Housing and Community Development, flow restrictors will be installed in the sink, the shower and water hook-up valves. Tenants will be provided with water conservation measures free of charge. Landlords/owners are required to repair any leaks identified during the water audit before the conservation efforts will be implemented.

Using its MTW authority, those HCV households that have participated in the water audit and had the flow restrictive devices installed will be eligible to have low-flow toilets purchased and installed, free of charge, by HABC. HABC will establish a conservation water/sewer utility allowance (UA) for households who take part in and complete the water audit. HABC will apply the conservation water/sewer UA to the household at their first regular recertification after the conservation activities have been completed. Participation in the audit is not mandatory, however owners and tenants are incentivized to complete the audit to receive new toilets and reduce their water/sewer bills. Cost savings for this MTW initiative will be fully realized upon full reimbursement of the capital expenditure and upon adjustment of applicable UAs.

Water consumption allowances were calculated for HABC public housing developments Brooklyn Homes and Westport Homes after the sites underwent the installation of major conservation measures (lighting, water conservation fixtures, utility metering and system upgrades) pursuant to an Energy Performance Contract (EPC). Consumption was estimated using a study of water end uses sponsored by the American Water Works Association, and

reported in the following document:

Residential End Uses of Water, American Water Works Association Research Foundation (AWWARF), 1999, ISBN 1-58321-016-4

HABC will use this same method to calculate energy conservation utility allowances for applicable units in the Housing Choice Voucher Program (HCVP).

The AWWA study is based upon metered data from residences, and provides an overall average equation for total average water use. The water usage equation in the above report was adapted to the following form for this effort:

$$W = 69.2 + 37.2 \times P, \text{ where}$$

W = average gallons per day per household
 P = number of persons in household

The constants used in the equation above are national average values that include only a minor fraction of low flow appliances. The estimates generated from the equation include water use for clothes washers and dishwashers, in their proportion found in the average population.

A fundamental assumption applied to the calculation of water allowances for HABC properties is that the allowance is for those occupants who are supposed to be in the dwelling unit (i.e., the number of tenants as identified on the lease). The data from HABC for the number of tenants, by lease, for HABC managed family and scattered site developments were used to calculate the average water use and hence the water allowance.

The AWWA average annual water consumption, for all homes in the study, by fixture type, was used as a starting point to estimate an interior use water allowance for HABC. These overall average consumption rates by fixture type were then expressed as a percentage and then applied to the total average use by household as calculated from the above AWWA equation but using the average number of residents by bedroom size for the HABC managed family and scattered site developments. It is HABC's contention that these sites are most similar to those found in the private market under the HCVP.

The Table below illustrates the average water consumption rates by fixture type, for dwelling units similar to the AWWA study, but representing the occupancy characteristics (by lease) of the HABC family developments (*and prior to installation of low flow fixtures*).

Water Consumption for Average A WWA Household (gal/day/DU), HABC Demographics									
	AWWA Averages					2.160274			
	Percent	G/P/D	OBR	1 BR	2 BR	Avg BR	3 BR	4 BR	5 BR
Occupants	---	0	1.03	1.06	2.31	2.37	3.26	4.22	4.53
Toilet	26.7%	18.50	28.8	29.03	41.48	42.06	50.90	60.50	63.55
Shower	16.8%	11.60	18.0	18.20	26.01	26.37	31.92	37.94	39.85
Faucet	15.7%	10.85	16.9	17.03	24.33	24.67	29.85	35.48	37.27
Bath	1.7%	1.20	1.9	1.88	2.69	2.73	3.30	3.92	4.12
Dishwasher	1.4%	1.00	1.6	1.57	2.24	2.27	2.75	3.27	3.44
Clothes Washer	21.7%	15.00	23.3	23.54	33.63	34.10	41.27	49.06	51.53
Leaks	13.7%	9.50	14.8	14.91	21.30	21.60	26.14	31.07	32.63
Other	2.2%	1.55	2.4	2.43	3.48	3.52	4.26	5.07	5.32
AWWA Total		69.20	107.56	108.58	155.17	157.32	190.40	226.32	237.72

The next step in the process of estimating water allowances was to adjust the above AWWA sourced average data to account for specific characteristics of the HABC properties of interest, post EPC installation work. Notably, the two developments of interest now have low flow fixtures installed for toilets, showerheads and faucets (i.e., aerators). The following assumptions and analyses were performed to derive the recommended water allowances:

- Toilet Water Use Adjustment: *Ultra low flow toilets* have been installed (1 gallon per flush). The AWWA report presents data showing that *low flow toilets* (i.e., nominally 1.6 gpf in the AWWA study) statistically result in an average of 9.5 gal/person/day rather than the “old” overall average of 18.5 gal/person/day. Hence the average per capita toilet water use was adjusted by the ratio of 9.5/18.5. It was then further adjusted to account for the installed “ultra-low” toilets by adjusting to a ratio of 1gal/flush/1.6 gal/flush. As shown in the table below, this reduces the average per capita toilet water use to 32.4%. This value was then applied to the distribution by bedroom size to generate the data shown in the Table below.
- Shower Water Use Adjustment: Showerheads: *Ultra low flow showerheads* have been installed (1.75 gal/hour). The AWWA report presents data showing that *low flow showerheads* (i.e., nominally 2.5 gal/hour in the AWWA study) statistically result in an average of 8.8 gal/hour rather than the “old” overall average of 11.7 gal/hour. Hence the average per capita showerhead water use was adjusted by the ratio of 8.8/11.6. It was then further adjusted to account for the installed “ultra-low” toilets by adjusting to a ratio of 1.75gal/hour/2.5 gal/hour. As shown below, this reduces the average per capita toilet water use to 52.6%. This value was then applied to the distribution by bedroom size to generate the data shown below.
- Faucet Water Use Adjustment: Low flow aerators are installed for kitchen faucets (1 gallon

per minute) and for bathroom lavatory faucets (0.5 gpm). Assuming water use between the two is 75% kitchen and 25% bathroom results in an average overall rate of 0.875 gpm. The AWWA average rate of use is assumed to be 2.2 gpm. Adjustments were then made to the AWWA data to reduce the average per capita faucet water use to 54.83%. This value was then applied to the distribution by bedroom size to generate the data below.

The Table below illustrates the results of the adjustments made to the AWWA average data and the resulting final water allowances for indoor use. The AWWA national average leakage percentage was assumed to be an average of the “normal” leakage rate and leakage rate for efficient fixtures (conservative to the tenants benefit).

Recommended Water Consumption Allowances for Indoor Water Use									
	Adjustments to AWWA					2.160274			
	Percent	G/P/D	0BR	1 BR	2 BR	Avg BR	3 BR	4 BR	5 BR
Occupants	---	0	1.03	1.06	2.31	2.37	3.26	4.22	4.53
Toilet	32.4%	6.00	9.3	9.41	13.45	13.64	16.51	19.62	20.61
Shower	52.6%	6.11	9.5	9.58	13.69	13.88	16.80	19.97	20.98
Faucet	54.8%	5.95	9.2	9.33	13.34	13.52	16.37	19.46	20.44
Bath	100.0%	1.20	1.9	1.88	2.69	2.73	3.30	3.92	4.12
*Dishwasher	0.0%	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00
*Clothes Washer	0.0%	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00
Leaks	42.1%	4.00	6.2	6.28	8.97	9.09	11.01	13.08	13.74
Other	100.0%	1.55	2.4	2.43	3.48	3.52	4.26	5.07	5.32
Allowance Total		G/d/hh	38.6	38.92	55.62	56.40	68.25	81.13	85.21

*Note in the above Tablet that Dishwasher and Clothes Washer water use is set at zero; HABC as a policy decision does not include these uses in its allowance.

Statutory Objective: This initiative will support the MTW Statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures.

Anticipated Impact: HABC anticipates that this activity will result in a decrease in the cost of utility allowances provided to HABC households and hence decrease the total HAP expenditures while providing important energy conservation measures. Initially, the reduction in UA will match the savings afforded to the tenant by implementing the water conservation measures. However, the costs of utilities are going up every year, the savings from the water conservation efforts will be exponential. HABC will not have the data necessary to calculate savings in dollars until after implementation in FY2015. Tenant training on water conservation measures is a requirement of the program and HABC anticipates a reduction in consumption,

especially once leaks are repaired and low-flow toilets and flow restrictors are installed and operational.

Anticipated Timeline: Planning, policy and procedure development will be undertaken in the first part of FY 2015 with implementation by the end of FY 2016.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark *	Outcome **	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$4,103,018 5,262 households pay water/sewer	\$3,657,849 1,638 households will participate in FY 2015. 35% savings is anticipated HABC may re-establish benchmark upon final implementation of this activity.		

*HCV households are on either a 2 or 3 year recertification cycle. Savings anticipated in FY 2015 represent approximately 50% of the participants, of which 75% will take part in this initiative. The remaining households will be offered this opportunity upon their next recertification.

**HABC will recoup the investment for this initiative within a two year period. As such, full savings will be generated once the initial investment has been recouped.

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		

<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0	0		

Data Source: HABC will use data collected from its software systems to determine the savings in water/sewer utility allowances.

Authorization: Standard: MTW Agreement, Attachment C, Paragraph B (1) (b) – The Agency may use MTW funds for any eligible activity under Sections 9(d)(1), 9(e)(1) and Section 8(o) of the 1937 Act. Within the scope of the permissible eligible activities, the Agency can carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve greater cost effectiveness in Federal expenditures, to give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families, through activities that would otherwise be eligible under sections 8 and 9 of the 1937 Act....

HABC will use MTW block grant funds to purchase and install low-flow toilets free of charge for those landlords who choose to participate in the water audit and installation of the water flow restrictive devices.

Additional Information for Rent Reform Activities

Impact Analysis: HABC conducted an impact analysis to determine the impact on households with existing water/sewer utility payment responsibility. A Landlord Participation Survey revealed that 5,200 households currently receive a UA for water/sewer and that 75% of these households will participate in the water audit and be eligible for the conservation UA for water/sewer. As a result of water/sewer savings from low-flow toilets and flow restrictors, HABC anticipates a reduction in water consumption on average of 35% per household. HABC will not lower the UA until all conservation features have been installed. There should be no financial impact to HCV households as the HABC conservation UA for water/sewer reflects the revised consumption rates.

HABC will prepare a work plan for implementation of this rent reform initiative. The work plan will include, but not be limited to, development of policies and procedures, landlord/tenant outreach and notification, software modifications, forms/letters and training.

Hardship Case Criteria: Households may request a reasonable accommodation (RA) for an individual with disabilities when a household's actual water consumption is in excess of reasonable consumption by an energy conservative household. Approval of the RA will be contingent on obtaining third party verification. HABC will use existing procedures for requesting and reviewing requests for reasonable accommodations.

Annual Reevaluation of Rent Reform: HABC will review data on households with water/sewer UAs on an annual basis. Upon review of the analysis, HABC may modify this initiative to mitigate negative impacts.

Transition Period: HABC will apply this policy to households when and if they complete the water audit and after low-flow toilets and flow restrictive devices have been installed.

20. Limit on Interim Recertifications

Description of MTW Activity: Currently HABC conducts regular recertifications on a biennial basis for all households with some exceptions, i.e. households with homeownership vouchers. HABC conducts regular recertifications every three (3) years for elderly and/or disabled households on fixed incomes. HABC existing policy on interim reexamination is such that households may report decreases in income/increases in unreimbursed expenses at any time (voluntary interim recertification) and HABC will, upon verification of the change, process an interim rent reduction. Conversely, households are required to report certain changes in household composition and increases in income (required interim recertifications). For example, households are required to report when gross household income increases by \$5,200 annually. In such cases, HABC will process an interim rent increase three months from the date of the change or on the effective date of the recertification, whichever comes earlier. On an annual basis, HABC processes more than two (2) interim reexams for approximately 743 households.

MTW authority is necessary to waive certain sections of the 1937 Housing Act in order to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the Housing Act of 1937 and its implementing regulations (see citation below). Using its MTW authority, HABC will implement a limit on voluntary interim recertifications. Households will be limited to two (2) voluntary interim recertifications between each biennial recertification cycle. Elderly and disabled households are exempt from the limit on voluntary recertifications. It is anticipated that this activity will result in administrative efficiencies and will simplify procedures for staff. HABC anticipates completing 743 less interim reexams on an annual basis. Current HABC experience is that only 5% of households request more than two (2) interim recertifications between regular recertifications. This limit should not pose a hardship on the vast majority of participating households. Required interim reporting will not count toward the limit on voluntary recertifications.

HABC will establish hardship criteria for households who have already reached their limit on interim recertifications and who experience an additional decrease in income or increase in applicable unreimbursed expenses. Such criteria may include the death of a household member who is a majority contributor to household income, or a household that is experiencing a rent burden of over 50% due to the latest change in income/expenses.

Statutory Objective: This initiative will support the MTW Statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures.

Anticipated Impact: HABC anticipates that this activity will allow HABC to continue to assist the same number of families given the deep cuts which resulted from proration and sequestration. With the savings generated by this initiative, it will decrease staff time otherwise dedicated to interim recertifications.

Anticipated Timeline: HABC anticipates implementation of this initiative by mid-year FY 2015.

Additional Information for Rent Reform Activities

Impact Analysis: HABC anticipates completing 743 less interim reexams on an annual basis. Current HABC experience is that only 5% of households request more than two (2) interim recertifications between regular recertifications. This limit should not pose a hardship on the vast majority of participating households. Required interim reporting will not count toward the limit on voluntary recertifications.

Hardship Case Criteria: For households that have reached their limit on voluntary interim recertifications, HABC will accept the following as hardship case criterion:

- The death or incapacitation of a household member who is a majority contributor to household income; or
- A household that is experiencing a rent burden of over 50% due to the latest change in income/expenses.
- Other justifiable expenses due to major life events (i.e. major illness or unexpected primary care provisions for household / non-household members;
- Other cases will be reviewed on a case by case basis and hardship determined at the discretion of the Associate Deputy Director for HABC.

Annual Reevaluation of Rent Reform:

HABC will establish this activity with a three month trial period and will continue to monitor and evaluate the impact on the hardship families.

Transition Period: Commencing with recertifications and new admissions effective November 1, 2014. Tenants will be provided with appropriate notification at least 60 days in advance of the effective date.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Dollars saved as a result of this activity	\$177,339 To complete 2229 interim reexams (743 families had at least 2,229 interim reexams. \$79.56 per interim (3.5 hours) @ \$22.73/hr.)	\$118,226 1,486 interim reexams times \$79.56/reexam HABC may re-establish benchmark upon final implementation of this activity.		

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Staff hours saved as a result of this activity	7,801 hours To complete 2229 interim reexams (743 families @ 3 interim reexams per family. 3.5 hours/interim reexam)	5,201 hours (743 families @ 2 interim reexams per family. 3.5 hours/interim reexam) HABC may re-establish benchmark upon final implementation of this activity.		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	25% <i>(Includes minor to fatal errors)</i>	16.75% <i>(Includes minor to fatal errors)</i>		

Data Source: HABC will use data collected from its software systems to determine the volume of transactions completed and staff time savings.

Authorization Standard: MTW Agreement, Attachment C, Paragraph D (1) (c) – The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the Housing Act of 1937 and its implementing regulations. This authorization waives certain provisions of Section 8 (o) (5) of the 1937 Act and 24 C.F.R. 985.516 as necessary to implement HABC’s Annual MTW Plan.

21. Project Based Voucher Amendments to the HAP Contract

Description of MTW Activity: HUD regulations at 24 CFR 983.206 (b) provide that “a HAP contract may be amended during the three-year period immediately following the execution date of the HAP contract to add additional PBV contract units in the same building. An amendment to the HAP contract is subject to all PBV requirements (e.g., rents are reasonable), except that a new PBV request for proposals is not required. “

Using its MTW authority, HABC plans to waive this three-year restriction, which will allow HABC to amend the HAP contract at any time during the initial fifteen year term of the HAP contract and during any renewal term of the HAP contract. Under this proposal, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non-Bailey LTA PB units.

At HABC's discretion and subject to all PBV regulatory requirements on the number of dwelling units that may receive PBV assistance per project and on the overall size of HABC's PBV program, a HAP contract may be amended during the initial term and during any renewal term of the HAP contract to add additional PBV units in the same project.

Statutory Objective: This initiative will support the MTW Statutory objective to increase housing choice for low-income families.

Anticipated Impact: HABC anticipates that this activity will enable HABC to maintain and increase the amount of units designated for the Bailey Consent Decree and/or increase the HABC's overall PB inventory. HABC will consider adding contract units to the HAP contract when HABC determines that additional housing is needed to serve eligible low-income families or special populations.

Anticipated Timeline: At this time HABC has no specific properties to which it is planning to increase its PBV commitments.

Metrics:

<i>HABC Metric: Increasing Housing Choices</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of families that would otherwise remain without housing assistance if the 3-year restriction had not been waived.	0	0 HABC will re-establish benchmark upon final implementation of this activity.		

Data Source: HABC will use data collected from its software systems to determine the change in and volume of PB housing opportunities.

Authorization Standard: MTW Agreement, Attachment C, Paragraph D (1) (a) and Attachment C Paragraph D (7) – The agency is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. This authorization waives certain provisions of the Section 8 (o) (7) of the 1937 Act, 24 C.F.R. 982.162 and 24 CFR 983 as necessary to implement HABC's Annual MTW Plan.

22. The Front Door Program

Description of MTW Activity: HABC will partner with the Mayor's Office of Human Services/Homeless Services Program, Sarah's Hope (a shelter for the homeless); and St. Vincent De Paul and will provide MTW Block Grant funds to the Front Door Program that will

rapidly house 36 homeless families for up to one year using two distinct strategies. HABC will monitor each family's continuous occupancy for two-years after lease up.

The Front Door Program (FDP) will employ two distinct strategies to rapidly re-house homeless families, depending on the client's household configuration, their needs, and their eligibility for various services:

Shelter + Rapid Re-housing: For families admitted to Sarah's Hope, a shelter stay of 90 to 120 days is targeted, during which time families receive comprehensive, stabilization services, including intensive case management to address mental health, addiction, child care and school enrollment, as well as other barriers to employment and long term sustainability. They also: participate in classes in life skills and family finances, parenting skills, and employment readiness; receive employment counseling and referrals for employment or employment training; and access housing and financial counseling to ensure the sustainability of a housing placement.

Families are also assisted in setting up a savings account and encouraged to fund the account during the entire period of services. Once each client's goals are met, a determination is made as to the type of housing that is most appropriate to meet the needs of the family.

A certain number of families (estimated at 16 per year) that meet specific eligibility requirements access transitional housing at St. Vincent de Paul's Cottage Avenue Community, or a similar program. A second group (estimated at 10 per year) meeting the chronically homeless eligibility requirements receive housing vouchers and up to 30 months of case management. The balance of the families (estimated at 22 per year) is provided with medium term rental assistance combined with intensive case management.

For the latter group, a market rate unit is identified with the family in a location that is appropriate and preferred by the family. A lease is executed in the clients' name, with St. Vincent de Paul serving as guarantor. Families are provided with financial assistance to address arrearages, pay the security deposit, and purchase furnishings for their unit.

The amount of rental assistance is on a gradually declining scale equal to a 100% subsidy of the rent for 6 months, followed by 50% subsidy for 3 months, followed by 25% subsidy for 3 months, with intensive case management and housing support for up to 12 months after placement. After 12 months of sustainability, the families take full responsibility for the lease (SVDP role as guarantor ceases) and the family pays the full market rent.

Shelter Diversion + Rapid Re-housing: For families with teenage boys age 13 and older, or with adult males, who are required to be served under the Hearth Act, but who cannot stay at Sarah's Hope due to the shelter's congregate, dorm living arrangement, will be the priority for a shelter diversion strategy.

The number of families to be served using this strategy is estimated at 12 per year. These referrals are coordinated through DSS HESU. Under this strategy, scattered-site "*shelter diversion units*" are offered. Instead of staying at Sarah's Hope, these families stay temporarily (less than 30 days) in motels, while case management and housing staff work intensively with them to place them quickly into permanent housing. They access immediate financial

assistance to address arrearages, pay the security deposit, and purchase furnishings, and are fast-tracked into a housing unit in their name within 30 days, with SVDP as guarantor on the lease.

Once placed in housing, families receive medium term rental assistance combined with intensive case management services. Families served using the shelter diversion strategy will be eligible to participate in classes in life skills and family finances, parenting skills, and employment readiness; receive employment counseling and referrals for employment or employment training; access housing and financial counseling to ensure the sustainability of a housing placement, and any other services offered at Sarah's Hope, though the location of their housing may make ongoing participation impractical or not desirable. Families are also assisted in setting up a savings account and encouraged to fund the account during the entire period of services.

The amount of rental assistance for these families is on a gradually declining scale equal to a 100% subsidy of the rent for 8 months, followed by 50% subsidy for 3 months, followed by 25% subsidy for 3 months, with intensive case management and housing support for up to 15 months after placement. After 15 months of sustainability, the families take full responsibility for the lease (SVDP role as guarantor ceases) and the family pays the full market rent.

1. **Total Number to be Served:** 36 families per year
 - a. Shelter Stay + Rapid Re-housing: 24 families per year
 - b. Shelter Diversion + Rapid Re-housing: 12 families per year

2. **Key Measurables:**
 - a. Length of Shelter Stay
 - b. Number of Families placed in housing
 - c. Number and % of Families sustaining housing at 6 months
 - d. Number and % of Families sustaining housing at 12 months
 - e. Number and % of Families sustaining housing at 18 months
 - f. Number and % of Families sustaining housing at 24 months
 - g. Number and % of families returning to Baltimore City shelter system.

The maximum funding for the program will be the equivalent of 8 vouchers (approximately \$81,600) and 50% of the funding will be distributed to the sponsor upon execution of the Memorandum of Agreement. The sponsor will identify families for rapid referral. Initial participants will be assisted through an upfront mobilization payment of 50% (approximately \$40,800) since it would be time consuming to respond to individual requisitions for each family. The balance will be distributed in yet to be established periodic payments contingent upon the rental success of the program.

The exact number of families served and costs cannot be projected since individual rents will vary. We have established a water mark of 36 families (dependent upon the level of funding and services from not-for-profits and/or other local service providers). Although we are projecting a high success rate (at least 75% of the families to maintain occupancy for two years and beyond), we cannot predict program attrition, or partially successful occupancies (less than two years).

HABC will monitor housed families for at least two years to ensure the MTW contributions will be significantly less than similar families under conventional HCVP, HAP contract guidelines.

During the life of the Front Door Program, the use of MTW funding should equate to HCVP UML's for families served on a monthly basis. This should apply for each family that receives housing when the family remains housed for a cost that is equal to or less than the cost of a HABC voucher.

Statutory Objective: This initiative will support the MTW Statutory objective to increase housing choices for low-income families.

Anticipated Impact Analysis: This initiative is subject to availability of funding and if successful will re-house 36 homeless families and transition them back to self-sufficiency by using two strategies that include housing 24 families for the Shelter Stay & Rapid Re-Housing option and 12 families for the Shelter Diversion strategy for a total of 36 families.

Anticipated Timeline: The Front Door Program MOU between HABC and the Mayor Office of Human Services, the Office of Homeless Services is planned to be executed in July, 2014.

Transition Period.: When the Program is finalized participants will be referred from Sarah's Hope once they complete classes in life skills, family finances, parenting skills, and employment readiness; receive employment counseling and referrals for employment or employment training; and access housing and financial counseling to ensure the sustainability of a housing placement.

Hardship Policy. Retention case managers will closely monitor participants. In the event the participant loses his or her employment, he/she will be referred to one of the Emergency Solutions Grant Program's eviction prevention providers to receive counseling, case management, and eviction prevention assistance or other support services.

Board Adoption and Public Hearing. This policy was adopted by HABC's Board of Commissioners as part of the FY14 MTW Annual Plan. The public hearing for the Annual Plan also served as the Public Hearing for the Local Subsidy Program. The policy was presented to residents as well as the Resident Advisory Board at several meetings prior to the Public Hearing.

Metrics:

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0	\$352,000 in matched funds		

<i>HABC Metric: Increasing Housing Choices</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	24 units		
<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy (in dollars).	\$0.00	\$15,080/yr		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category:	Enrolled in Job Training Program:	Enrolled in Job Training Program:		
(1) Employed Full-Time	0	24		
	(1) Employed Full-Time:	(1) Employed Full-Time:		
	0	24		
(2) Employed Part-Time	(2) Part-Time Employed:	(2) Part-Time Employed:		
	0	0		
(3) Enrolled in an Educational Program	(3) Enrolled in Education Program:	(3) Enrolled in Education Program:		
	0	0		
(4) Enrolled in Job Training Program	(4) Enrolled in Job Training Program:	(4) Enrolled in Job Training Program:		

(5) Unemployed	0%	100%		
(6) Other	(5) Unemployed: 100%	(5) Unemployed: 0%		
	(6) Other: 0%	(6) Other: 0%		
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	24	0		
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	24		
SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for “self-sufficiency” to use for this metric. Each time the PHA uses this metric, the “Outcome” number should also be provided in Section (II) Operating Information in the space provided.	0	24		

Data Source: Reports will be submitted quarterly by the Mayor’s Office of Human Services/Homeless Services Program to include the number and percentage of clients participating that secured housing and remained housed for, 6, 12, 18 and 24 months; the number and percentage who return to the Baltimore City Shelter System, the rental/subsidy amounts, and locations of units, landlord info; balance of sub-grant; and reasons why families that secured and remained housed left the Program.

Authorization Standard: Attachment C, sections B1b(iii), 1b(viii); and section B2; Attachment D, “Single Fund Budget with Full Flexibility”, and full compliance with PIH 2011-45 when invoking such authorization.

B. Thompson Leased Housing Proposed MTW Activities

23. Encouraging Leasing in Higher Opportunity Neighborhoods

Description of MTW Activity: HUD regulations provide that HCV participants may lease units that are larger than their authorized voucher size. In these instances, the Thompson Regional Mobility program follows regulatory requirements and applies the payment standard for the smaller of the actual unit size or voucher size. In this way participants, as applicable, pay an additional share of rent for leasing units larger than their authorized voucher sizes. In some instances, participants, wishing to lease larger units than their authorized voucher size, locate and lease units in lower cost, less desirable and high poverty concentration neighborhoods. In other instances, participants locate and lease larger units than authorized by their voucher size and subsequently lease the extra bedrooms to generate income. Households who do not comply with program requirements may be terminated. It is the goal of the Thompson regional mobility program to encourage families to locate and lease units in higher opportunity neighborhoods with lower poverty concentrations. Using its MTW authority, the Baltimore regional mobility program will require families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy will apply to new admissions as well as to participating households who request program moves. HABC, on a case by case basis, will make exceptions to this policy as a reasonable accommodation.

Statutory Objective: This initiative will support the MTW Statutory objective to increase housing choice for low-income families.

Anticipated Impact: It is anticipated that this activity will result in location and leasing of units in higher opportunity neighborhoods which have lower poverty and minority concentrations while also reducing the opportunity for program fraud.

Anticipated Timeline: It is anticipated that this activity will be implemented immediately upon approval of the MTW Plan.

Metrics:

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able that moved to a better unit and/or neighborhood as a result of this activity (increase).	0	525		

Data Source: The Thompson regional mobility program will use data collected from its software systems to determine the change in and volume of households leasing units within their required voucher size as well as the change in the number of households who lease units in higher opportunity neighborhoods.

Authorization Standard: MTW Agreement, Attachment C, Paragraph D (1) (f) – The agency is authorized to determine property eligibility criteria, including types of units currently prohibited by Section 8 regulations, as well as shared living facilities. This authorization waives certain provisions of Section 8(p) of the 1937 Act and 24 CFR 983.53-54 and 982 Subparts H and M as necessary to implement the Agency's Annual MTW Plan.

IV. Ongoing MTW Activities

A. Implemented Activities

Public Housing

1. Two Year Recertifications

Description/Update of MTW Activity: HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. The HABC will generally conduct a full reexamination of household income and composition for all fixed income households one time every twenty-four (24) months.

Proposed Changes: HABC will revise and expand its current public housing two year recertification initiative to: 1) include all households with employment or TANF as primary income sources in addition to all fixed income households; and, 2) Eliminate the current procedure by which income and family composition is verified between the regularly scheduled two year recertification dates.

Approval and Implementation: Approved in 2006 and implemented in 2011. HABC will implement the revised process upon approval of the FY 2015 Annual Plan.

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$110,759	\$54,198		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	4,335 hours	2,121 hours		
<i>CE #3: Decrease in Error Rate</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	25% (includes minor to fatal errors)	16.75% (includes minor to fatal errors)		

2. Homeownership Plan

Description/Update of MTW Activity: HABC modified its existing Section 32 Homeownership Plan. It incorporates features that differ from the standard Section 32 homeownership requirements as follows:

- The elimination of a firm cap on the percentage of adjusted income that is considered “affordable” for homeownership purposes;
- Extension of the recapture period for net sales appreciation to a total of 10 years using a declining scale; and
- Open timetable and the number of scattered site units to be covered under the Plan, i.e. potentially over time, all scattered site units could be eligible for homeownership for qualified households.

Proposed Changes: None

Approval and Implementation: 2009

Changes to metrics, baselines, and benchmarks: Under HUD’s revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>HC #5: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit as a result of the activity	0	3 households		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase).	0	3 households		

3. Asset Self-Certification

Description/Update of MTW Activity: To streamline operations, HABC will allow residents to self-certify income from assets with total asset values per household of less than \$5,000.

Proposed Changes: None

Approval and Implementation: 2011

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$7,058	\$715		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	276 hours	28 hours		
CE #3: Decrease in Error Rate				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	5% (includes minor to fatal errors)	2% (includes minor to fatal errors)		

Leased Housing

4. Risk Based Inspections

Description/Update of MTW Activity: HABC is moving to a Risk-Based inspection process in order to ensure that the highest housing quality standards are maintained and that HABC resources are utilized in an efficient and effective manner. Units, which have consistently met annual inspection standards, will be inspected every two (2) years. Units, which do not

have such a track record, will be inspected annually. HABC reserves the right to set and modify the inspection schedule for each unit. Special inspections may be scheduled at any time at HABC's discretion.

HABC conducted a pilot program in CY 2013 on Project-Based sites and anticipates implementing this initiative for the entire inventory in CY 2014. HABC reserves the right to set and modify the inspection schedule for each unit.

HABC will begin a campaign in FY 2015 informing landlords program-wide about the benefits of biennial inspections for units that consistently meet annual inspection standards.

Proposed Changes: HABC will also allow owners to self-certify units in good standing for minor non-health and safety related violations remedied and documented within a restricted timeframe.

Approval and Implementation: 2006 - Implementation activities began in FY 2014

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$803,743	\$742,280		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	35,360 hours	32,656 hours		
<i>CE #3: Decrease in Error Rate</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	10%	9.95%		

5. Multi-Year Recertifications

Description/Update of MTW Activity: Two-Year Recertifications (2006): HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. The HABC will conduct a reexamination of household income and composition for all households one time every twenty-four (24) months. The 24-month reexamination policy does not apply to:

- Residents living in Mod Rehab and Mod Rehab SRO units
- Residents with other vouchers that do not qualify based on HUD funding restrictions.
- Residents with Homeownership vouchers
- Residents with HUD Awarded Special vouchers (Veterans Affairs Supportive Housing (VASH)).

Three-Year Recertifications (2013): HABC transitioned elderly and/or disabled families on fixed incomes to a three year recertification schedule. All other families remain on a two-year cycle except for the Non-MTW voucher families noted above.

Proposed Changes: None

Approval and Implementation: 2006 – Two year recertifications were implemented in 2007 and three year recertifications were implemented in 2013

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$1,134,696	\$638,267		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	49,920 hours	28,080 hours		

CE #3: Decrease in Error Rate				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	25% (includes minor to fatal errors)	16.75% (includes minor to fatal errors)		

6. Limits on Project Based Vouchers and Increased Project Based Units in a Project or Building

Description/Update of MTW Activity: HABC reserves the right to allocate up to 30% of its Tenant Based HCV funding for Project Based Vouchers. The HCV Administrative Plan was also modified to allow HABC to enter into Project-Based Voucher HAP contracts for greater than 25% of the units in a project/development regardless of the family or household type that will occupy the units provided that the household is eligible.

Units subsidized with project-based vouchers under this MTW initiative are placed under a HAP contract upon turnover.

Currently, due to limitations in funding, HABC allocates 14% of its Tenant Based HCV funds to Project Based Vouchers, but anticipates increasing this allocation by waiving the per-building and per-project cap on future projects.

Proposed Changes: None

Approval and Implementation: The right to allocate up to 30% of HABC's HCV funds to Project Based Vouchers was approved in FY 2006. The per-building and per-project cap waiver was approved in FY 2010.

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

HABC Metric: Increasing Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for families with disabilities at or below 80% AMI as a result of the activity (increase).	0	31 units		

HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease). If units reach a specific type of household give that type in this box.	0	0		

7. Project-Based, or Transitional Housing

Description/Update of MTW Activity: As provided under the MTW Agreement, HABC is authorized to waive certain provisions of 24 CFR 983.53 in order to pay Project Based Voucher assistance for units in a transitional housing facility. Such authorization increases housing choices for low-income families.

Proposed Changes: None

Approval and Implementation: 2007-2008 and implemented in FY 2011.

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	18		
HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0	18		

8. Unit Sizes

Description/Update of MTW Activity: The HCV Administrative Plan was modified to require participating families to select a unit size consistent with and not greater than the unit size listed on their voucher. Exceptions to this rule may be granted at the discretion of HABC where the voucher holder can demonstrate that a good faith and exhaustive effort has been made to find an appropriately sized unit or based on a reasonable accommodation request. This requirement has been modified to include current participants living in units where the unit size exceeds the voucher size.

At recertification, HABC will review with current participants the household composition and may require the family to move to the correct unit size. If the family chooses not to move, the payment standard will be adjusted to reflect the appropriate unit size.

There may be a potential delay of outcomes, due to the simultaneous implementation of the three-year recertification cycle with this MTW activity.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$120,000,000	\$100,960,000		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		

<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0	0		
<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	11,817 units	11,982 units		

9. The Bailey Long –Term Affordable Project-Based Voucher Contract

Description/Update of MTW Activity: As part of its Moving To Work (“MTW”) program, the Housing Authority of Baltimore City (“HABC”) established an initiative in 2010, referred to as the Long Term Affordable Project Based (“LTA”) Program, to create long term affordable units for persons with disabilities in compliance with the Bailey Consent Decree.

The LTA program combines features of the Project Based Voucher program – such as the ability of owners to obtain long-term financing from banks and other private equity sources – with the resident protections and long-term affordability features of the Public Housing program.

LTA units are subsidized through LTA Project Based contracts with minimum forty (40) year terms entered into between HABC and eligible property owners. LTA property owners are required to adopt the LTA Admissions & Continued Occupancy Criteria (“LTA Criteria”). Residents of LTA units will have rights and protections as set forth in the LTA Criteria and will enter into a lease with the project owner that is developed by HABC for the LTA units (the “LTA Lease”), which incorporates the regulatory requirements for a public housing lease and grievance procedures. LTA Project Based units are occupied by families on the public housing waiting list.

HABC will create a Housing Assistance Payment (HAP) contract to: increase the term of the contract to 40 years, consistent with the long term affordability period; and set forth what public housing rights, privileges and benefits must be afforded the NED residents in LTA units.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: Under HUD’s revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>HC #5: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit as a result of the activity	0	190 units		

10. The HABC Long –Term Affordable Project-Based Voucher Contract

Description/Update of MTW Activity: In FY 2014, HABC established the Long Term Affordable Project Based Program (“**LTA-PB Program**”). Under this Program, HABC created long term affordable project based units (“**Long Term Affordable Project Based Units**” or “**LTA-PB Units**”) in addition to the long term affordable units created for persons with disabilities pursuant to the Bailey Consent Decree which HUD previously approved under HABC’s MTW Agreement.

The LTA-PB Units shall be managed and operated primarily in accordance with the HUD regulations governing public housing units (*e.g.*, 24 CFR Parts 5, 960, 966, and the like) (the “**Public Housing Regulations**”), even though the LTA-PB Units will be subsidized with project based voucher funds. The LTA-PB Units shall remain affordable for a minimum of forty (40) years. The LTA-PB Program will provide to applicants for, and residents of, the LTA-PB Units most of the rights, privileges, and benefits that are provided under the public housing regulations. LTA Project Based units are occupied by families on the public housing waiting list.

LTA-PB property owners will be required to adopt the criteria for leasing and continued occupancy of the LTA-PB Units (“**LTA Criteria**”). HABC will require developers/owners of certain redeveloped public housing sites and/or certain project-based voucher sites to comply with the LTA Criteria.

Proposed Changes: None

Approval and Implementation: 2014

Changes to metrics, baselines, and benchmarks: Under HUD’s revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below

provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>HC #2: Units of Housing Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	23		
<i>HABC Metric: Increasing Housing Choices</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of low-income households able to move to a better unit as a result of the activity	0	23 households		

11. Utility Allowances for Families Living in Larger Units than Voucher Size

Description/Update of MTW Activity: The HCVP implemented changes in the use of its utility allowance table to calculate gross rents. The utility table used will be the lesser of the actual unit size or the voucher unit size. This change will apply to the tenant-based voucher program and the HCVP Homeownership program.

Proposed Changes: None

Approval and Implementation: 2012

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics:

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$1,837,927	\$1,601,047		

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0	0		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Increase in tenant rent share	\$0	\$236,880		

Thompson Leased Housing Program

12. Exception Payment Standards

Description/Update of MTW Activity: Payment Standards for the Thompson mobility program will be set between 90 and 130 percent of the HUD published Fair Market Rent. The payment standard will be set using a consistent methodology that compares the ration of area median rent to the actual rent of the census tract. Implementation of exception payment standards is subject to funding availability.

Proposed Changes: The Exceptions Payment Standard chart was updated as of January 1, 2014.

Approval and Implementation: 2007

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars	\$5,131.50 in FY 14* *This activity was implemented in 2006 but the data was not tracked until 2014 when savings had already been realized.	\$5500.00		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours. (decrease).	155.5 hours in FY 14* *This activity was implemented in 2006 but the data was not tracked until 2014 when savings had already been realized.	155.5 hours		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Increase in tenant rent share	\$365.65	\$423.22		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	375 households		

13. Biennial Recertifications

Description/Update of MTW Activity: Pursuant to HABC's MTW authority, families participating in the Baltimore Regional Housing Mobility Program must have their household composition and income re-determined at least once every 25 months.

Proposed Changes: None

Approval and Implementation: Approved in FY 2006 Plan and Implemented in 2007

Changes to metrics, baselines, and benchmarks: Under HUD’s revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The Baseline below was set in CY 2009 prior to implementation of this activity. The Baseline below is based on 1,246 participants and an average specialist salary of \$25.00 per hour. The Benchmark below is based on 2,363 participants and an average specialist salary of \$33.00. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$23,350	\$29,205		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	934 hours	885 hours		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	*This activity was implemented in 2007 but the data was never tracked until 2015.			

14. Risk Based Inspections

Description/Update of MTW Activity: Pursuant to HABC’s MTW authority, units in the Baltimore Regional Housing Mobility Program will have their units re-inspected at least once every 25 months. Owners and families are allowed to self-certify that non-emergency items identified as “fail” during an HQS inspection have been repaired. Only units located in the allowable (non-impacted) areas are eligible for this option. The fail items must be minor and determined to be non-emergency to be eligible for self-certification. The self-certification process will require the owner and tenant family to certify that the repairs have been made. A random sample of units that have been approved under the self-certification option will receive a quality control inspection.

Proposed Changes: None

Approval and Implementation: 2010

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The Baseline below was set in CY 2009 prior to implementation of this activity. The Baseline below is based on 1,246 participants and an average inspector salary of \$37.47 per hour. The Benchmark below is based on 2,363 participants and an average inspector salary of \$40.00 per hour. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$70,031	\$70,840		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	1,869 hours	1,771 hours		

15. HAP Contract Modifications – Floating Units

Description/Update of MTW Activity: The Special Administrative Plan was modified to reflect previously approved activities that have not yet been implemented related to the Project Based Voucher program. This initiative allows floating units instead of identifying specific units in the HAP contract in the Project Based Voucher program.

Proposed Changes: None

Approval and Implementation: Approved in 2009 and implemented in 2010.

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	4 units		

16. Asset Income

Description/Update of MTW Activity: HABC excludes all income from assets when the cash value of the asset is less than \$50,000. This initiative will reduce the time it takes to verify income. This rent simplification measure will increase efficiency without having any negative impact on increasing residents' rent.

Proposed Changes: None

Approval and Implementation: 2012

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The Baseline below was set in CY 2009 prior to implementation of this activity. The Baseline below is based on 1,246 participants and an average specialist salary of \$25.45 per hour. The Benchmark below is based on 2,363 participants oh which no participants have assets greater than \$50,000.

The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$23,795	\$0.00		

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	935 hours	0 hours		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease)	<1%	0%		

17. Adjusted Income

Description/Update of MTW Activity: Pursuant to HABC's MTW authority, the gross annual income of participants in the Baltimore Regional Housing Mobility Program shall be reduced using a standard deduction. There will be a standard deduction for working families, disabled families and non-disabled families without wages. The deductions are:

- \$3,200 for households with wages
- \$1,200 for households without wages
- \$400 for any elderly or disabled family (to be combined with either of the above deductions)

Proposed Changes: None

Approval and Implementation: 2012

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The Baseline below was set in CY 2009 prior to implementation of this activity. The Baseline below is based on 1,246 participants (recertified annually) and an average specialist salary of \$25.45 per hour. The Benchmark below is based on 2,363 participants (recertified every two years) and an average specialist salary of \$25.45 per hour. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$23,796	\$22,549		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	935 hours	886 hours		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease)	8%	0%		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Increase in tenant rent share	\$0	\$0		

18. Exclude Income from Full-Time Students and Adopted Household Members

Description/Update of MTW Activity: The goal of this activity is to exclude all income from full time students and adoptive income sources because the program has adopted flat deductions, and most of the income from these sources is statutorily excluded, upon full implementation, zero (0) families will have any income, for the purposes of calculating the tenant rent, attributable to full time students and/or adoptive income.

As of January 31, 2014, there were 0 clients with adoptive income and 42 clients with full time student status that also had wages. The wages for five (5) of the full time students was fully excluded. The remaining 37 clients will have the un-excluded portion (\$480) of their wages excluded at the time of their next biennial reexamination.

Proposed Changes: None

Approval and Implementation: 2014

Changes to metrics, baselines, and benchmarks: Under HUD's revised MTW reporting requirements, HABC is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The Baseline below is

based on 42 families who have income that is attributable to full time students and/or adoptive income, recertified annually at an average specialist salary of \$25.45 per hour. The Benchmark below is based on participants recertified every two years and an average specialist salary of \$25.45 per hour. The table below provides the revised information for this MTW activity. HABC will report on outcomes in the MTW Annual Report.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$534	\$0		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	21 hours	0 hours		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease)	<1%	0%		
<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Increase in tenant rent share	\$0	\$0		

B. Not Yet Implemented

Public Housing

1N. Rent Policy

Description of MTW Activity: HABC received HUD approval in FY 2012 to implement agency-wide the rent policy adopted for Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity has been placed on hold in FY 2014.

Proposed Changes: None

Approval and Implementation: 2012

Status Update: Once the Gilmor Homes Self Sufficiency policies have been finalized HABC will determine when this initiative will be implemented agency-wide.

C. Activities on Hold

Public Housing

1H. Family Self Sufficiency

Description of MTW Activity: HABC established a combined Public Housing and HCV Family Self Sufficiency program. Program requirements varied from the existing regulatory framework in the following ways:

- 1) Elimination of mandated thresholds for number of participants in the HCVP program and expansion of the program to include public housing residents;
- 2) Enhanced program design to target the populations in need;
- 3) A focused on outcomes that included homeownership and unsubsidized economic independence;
- 4) Modification of the maximum contract period from five (5) to four (4) years; and
- 5) Revised procedures/regulations regarding the release of the escrow funds.

Proposed Changes: None

Approval and Implementation: 2006

Status Update: The FSS program that required MTW authority was placed on hold in FY 2014. HABC has reverted back to the traditional FSS program and does not need MTW authority to implement. HABC may choose to reactivate this activity in the future, but at this time has no plans definitive for reactivation.

2H. Gilmor Self Sufficiency Initiative

Description MTW Activity: This activity simplified the rent policy for staff and residents; and encouraged employment, job retention, and wage progression. It also increased choices for HABC's clients by providing residents with an additional rent policy option; and applicants with a demonstration site with enhanced self-sufficiency services and a rent policy versus other available public housing sites.

Proposed Changes: HABC is working to revise the program policies.

Approval and Implementation: 2010

Status Update: This activity was placed on hold in FY 2014 as HABC works to revise the program policies. HABC may choose to reactivate this activity in the future, but at this time has no definitive plans for reactivation.

Leased Housing

3H. Section 811 Supportive Housing

Description of MTW Activity: HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intends to make these funds available through a competitive process and will require developers to demonstrate through specified documentation that the project has a gap that cannot otherwise be addressed.

Proposed Changes: None

Approval and Implementation: 2009

Status Update: This activity was placed on hold in FY 2014. HABC may choose to reactivate this activity in the future, but at this time has no definitive plans for reactivation.

4H. Project-Based Voucher Award Process

Description/Update of MTW Activity: HABC will establish a rolling selection process based on threshold criteria established by HABC

Proposed Changes: None

Approval and Implementation: 2014

Status Update: This MTW activity was intended to facilitate the increase of units in HABC's project-based voucher inventory in order to comply with the Authority's obligations under the Bailey Consent Decree ("the Decree"). Since HABC was able to acquire most of the units it needs under the Decree, this activity has been placed on hold but HABC may choose to reactivate it in the future.

5H. Rent Increase Determinations

Description/Update of MTW Activity: This activity will increase cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments will keep HCV program spending within budgetary limits. Exceeding available funding will force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners.

Proposed Changes: None

Approval and Implementation: 2011

Status Update: This MTW activity is intended to keep spending within budgetary limits. As such it has been placed on hold until such time as funding shortages dictate its use.

6H. Journey Home

Description/Update of MTW Activity: HABC will exercise its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program.

Associated Catholic Charities (ACC) provides job readiness and placement services to families from the Weinberg Housing Resource Center (a housing shelter). The families participate in the ACC's Work4Success (W4S) program, a five-day job readiness training program.

Upon completion of the W4S, participants meet with a Placement Manager who assess the participant's employability for temporary or permanent employment and assist the participant in finding such employment. Participants, that are currently unemployed, must attend all five (5) classes, meet all class standards, and attend all group and individual placement sessions.

ACC leases units with landlords in Baltimore City, places eligible families into these sites and provides rental subsidy on a sliding scale for nine (9) months. Approximately eight (8) weeks after becoming employed, the family will be able to move into a subsidized unit. The goal is for all families to transition in place and take over the lease from ACC.

In addition to a Placement Manager each family will also be assisted by a Case Manager from the Housing Resource Center, a Job Retention/Follow-up Case Manager and a Housing Specialist. Retention case managers will closely monitor participants. In the event the participant loses his or her employment, he or she will be referred to one of the Emergency 52 Solutions Grant Program's eviction prevention providers to receive counseling, case management, and eviction prevention assistance or other support services.

Proposed Changes: HABC will modify terms and conditions and possibly the funding or will terminate the program. If the latter is the selected option, HABC will more than likely develop a new program for the targeted population with appropriate guidelines for participant selection, type of services and duration, with better Quality Control.

Approval and Implementation: FY 2013

Status Update: The Journey Home Program has been put on hold effective June 2014 due to recruitment and retention issues. The program was shut down in May, and HABC has suspended activity for new participants but will continue to subsidize those already housed prior to May, 2014. After a reevaluation of this program,

Thompson Leased Housing Program

7H. Direct Homeownership Program

Description MTW Activity: The direct purchase second mortgage program is for applicants with incomes of no less than \$18,000 per year. Participants in this initiative do not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds is available through this program.

Proposed Changes: None

Approval and Implementation: FY 2012

Status Update: This activity was placed on hold in FY 2014 due to lack of participants.

D. Closed Out Activities

Fiscal Operations

1C. *Adoption of New Investment Policies for HABC*

In FY 2013, HABC proposed adopting new investment policies thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State.

Leased Housing

2C. *Payment Standards at the 50th Percentile*

This activity was approved in FY 2009. HUD has adjusted the area Fair Market Rent (FMR) to the 50th percentile for HABC; therefore MTW authority is no longer required and this activity was closed out in FY 2011.

Public Housing

3C. *TDC Limits*

In FY 2009 HABC established a local Total Development Cost policy to acquire the 58 scattered site units under the Thompson Consent Decree. This activity was approved by HUD via a letter dated March 12, 2009. In January 2012 the last the scattered site unit was acquired and this activity has been closed out.

Thompson Leased Housing Program

4C. *Utility Allowances for Families Living in Larger Units than Voucher Size*

This MTW activity was approved in the FY 2014 Annual Plan, but has been incorporated into the FY 2015 unit size proposal.

V. MTW Sources and Uses of Funding

This section of the Annual Plan describes HABC's planned sources and uses of MTW Block Grant. Planned sources and uses for other HUD, other federal, State and Local funds and other Non-MTW funds are described in a separate attachment. This financial plan is compiled based on current information and HUD's anticipated funding level as of February 2014. It is subject to revision as conditions and/or assumptions change.

A. Planned Sources and Uses of MTW Funds

HABC's Moving-to-Work (MTW) Block Grant includes three major funding sources:

- Low Income Public Housing (LIPH)
- Section 8 Housing Choice Voucher (HCV)
- Capital Fund Program (CFP) /Replacement Housing Factor Fund (RHFF)

This section of the Annual Plan describes HABC's planned sources and uses of MTW Block Grant. Planned sources and uses for other HUD, other federal, State and Local funds and other Non-MTW funds are described in a separate attachment. This financial plan is compiled based on current information and HUD's anticipated funding level as of February 2014. It is subject to revision as conditions and/or assumptions change.

On December 24, 2013, HABC received HUD approval of a Portfolio Award under the Resident Assistance Demonstration (RAD) program covering 22 public housing sites for a total of 4,063 units. This Portfolio Award is HUD's commitment to reserve conversion authority for the identified units in the portfolio. The purpose of the award is to begin the conversion of public housing to a form of project-based assistance under Section 8 of the Housing Act of 1937. The FY 2015 MTW Plan as described below includes the assumption to convert one-half of the RAD portfolio or 11 public housing sites for a total of 2,233 units in January 2015.

(V) Sources and Uses of Funds

MTW PLAN

V.1. Plan Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Coming Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 27,412,351
70600	HUD PHA Operating Grants	\$ 255,082,546
70610	Capital Grants	\$ 9,156,352
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$ 246,102
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$ 4,385,884
70000	Total Revenue	\$ 296,283,235

Notes to Sources:

1. Tenant Revenue is planned at a 97% occupancy rate. This revenue is planned for a reduction in January 2015 to include conversion of 11 RAD sites to the Section 8 program. Total Tenant Revenue also includes estimated income billable from various

tenant transactions such as warrant, court and maintenance costs anticipated during FY 2015.

2. HABC's Total Operating Grants of \$255,082,546 from HUD include the following funding estimates:
 - Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$123,065,845 for Regular HABC Vouchers are planned at the level based on 96.4% of CY 2013 total approved subsidy. The Thompson Partial Consent Decree and Remedial Vouchers totaling \$42,562,000 was provided by Baltimore Regional Housing Partnership (BRHP) based on the estimated leasing level.
 - Ongoing Administrative Fee Earned in the amount of \$10,099,851 (\$8,457,591 for Regular HABC Vouchers, \$1,642,260 for Partial Consent Decree and Remedial Vouchers) is calculated based on an estimated .3 % increase from CY 2013 and an estimated proration at 71%.
 - Public Housing Subsidies of \$71,350,344 are budgeted based on an estimated 84.99% funding proration for the fiscal year ending June 30, 2015.
 - Capital Fund soft costs in the amount of \$8,004,506 are estimated for administering the planned capital improvement and operating activities.
3. HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
4. Interest Income is based on HUD approved investments that yield an estimated interest rate of .2% as of December 2013.
5. There is no gain or loss estimated for disposal of capital assets. Although HABC plans to convert 11 public housing sites (2,233 units) to RAD in January 2015, a Notes Receivable will be established for the RAD transaction.
6. Other Income is related to vending machines, roof top antenna income, and lease income from the public housing program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program.

**MTW
PLAN**

Estimated Uses of MTW Funding for the Coming Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 32,660,686
91300+91310+92000	Management Fee Expense	\$ 2,658,943
91810	Allocated Overhead	\$ (1,030,494)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 2,615,040
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 22,182,091
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 33,975,749
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 1,915,930
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$ 1,460,055
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 20,607,521
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 3,278,516
97100+97200	Total Extraordinary Maintenance	\$ 1,175,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$165,627,845

	97400	Depreciation Expense	\$ 24,000,000
	97500+97600+97700+97800	All Other Expenses	\$0
	90000	Total Expenses	\$311,126,882

HABC's projected total MTW Uses of Funds are as follows:

Total Expenses	\$ 311,126,882
Less: Depreciation Expense	\$ (24,000,000)
Capital Hard Cost	\$ 21,998,407
MTW Uses of Funds	\$ 309,125,289

Uses of Fund exceed Sources of Fund by \$12,842,054, which will be supplemented by prior years HAP and MTW reserves for capital improvement activities and UFAS units as discussed in detail under the capital improvement plan. Capital Hard Costs in FY 2015 include 504 UFAS and ADA Compliance, security and safety projects, marketability and viability of existing portfolio, improvement of major systems, infrastructure, extraordinary maintenance, and creation of economically diverse stable neighborhoods using the mixed finance development approach by leveraging the MTW Block Grant. Also, major construction projects and estimated expenses for FY 2015 include roof replacement at Latrobe and McCulloh Homes, electrical distribution at Douglas Homes, steam and gas line repairs at Perkins and Douglas Homes.

Notes to Expense:

1. Administrative expenses include salaries and benefits for administrative and CFP/RHFF programs staff. Also included are salaries and benefits for Housing Management staff at the Asset Management Project (AMP) levels as well as program staffs for the Section 8 HCV program. In addition, this category also includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
2. Management Fees Expense includes fees for Privately Managed Sites and Enhanced Leasing contract in accordance with the Bailey Consent Decree.
3. Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for FY 2015 are included in Appendix C.
4. Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
5. Utilities include expenses for water, electricity, gas, steam and fuel consumed by the Housing Authority AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year. In addition, applicable utility savings as a

result of the Energy Performance Contract (EPC) has also been factored into the projected utility costs.

6. Ordinary Maintenance includes salaries and benefits of maintenance workers and crews assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes outside contract costs to privatized firms, which manage some of HABC's public housing and affordable housing units.
7. Protective Services includes salaries, benefits and other related costs of building monitors and lease enforcement personnel assigned to public housing developments.
8. Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
9. Other General Expenses include compensated absences, collection losses for uncollected rent, a \$6.5 million Debt Service Repayment from the Capital Fund Program to repay the State Capital Anticipation Loan Proceeds, as well as the annual Other Post Employment Benefits (OPEB) Cost as required under GASB Statement No. 45.
10. Interest Expense is budgeted for interest associated with the EPC Debt Service.
11. Extraordinary Maintenance is planned for unforeseen break down of heating systems, boilers, chillers, etc. This line also includes Casualty Loss which are estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
12. Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program. Section 8 HCV HAP expenditures are budgeted in the amount of \$165,627.845 (\$123,065,845 for Regular HABC Vouchers, \$27,812,000 for Partial Consent Decree Vouchers and 14,750,000 for Remedial Vouchers). The Plaintiffs of the Thompson Consent Decree have created a non-profit corporation, Baltimore Regional Housing Partnership (BRHP) to serve as Administrator and therefore, the HAP amount for Thompson consent decree and remedial vouchers in FY 2015 is reported as a pass-through to BRHP.
13. Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on the Authority's fixed asset records and depreciation methods.

B. Single Fund Flexibility

The MTW Agreement allows HABC to combine public housing operating and capital funds (including development and replacement housing factor) provided under Section 9, and HCV's tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide funding source. HABC uses this combined funding source to carry out MTW program activities in support of MTW statutory objectives to achieve greater costs effectiveness and to increase housing choices for low-income families.

The following activities will take place in FY 2015 using single fund flexibility concept:

- Due to inadequate funding for capital activities, HABC plans to use the prior year's HCV HAP Fund to supplement various capital improvements as detailed in the FY 2015 Capital Spending Plan using single fund flexibility concept.

- HABC continues to use the prior year's MTW Fund for renovation and development of UFAS units to meet the 504 accessibility requirements using single fund flexibility concept.
- HABC has informed the Community Development Administration ("CDA"), a unit of the Division of Development Finance of the Department of Housing and Community Development, a principal department of the State of Maryland, of its determination to optionally prepay a portion of the 2003 Capital Fund Financing Program Loan (the "Loan") dated as of December 1, 2003, from the proceeds of the Capital Fund Securitization Revenue Bonds, Series 2003. With consent from HUD's Public Housing Revitalization Division, HABC used the MTW funds for prepayment in the amount of \$19,340,000 to CDA in May 2014. In July 2014, CDA plans to submit a separate request for approval of the refinancing of the Loan through the issuance of a new set of bonds that will refund the Series 2003 Bonds. HABC anticipates that the effect of prepayment and entering into the refinancing arrangement will be to reduce annual loan debt service requirements from about \$6.5 million in 2014 to approximately \$3 million or less in future years. In addition, to the extent HABC participates in the Rental Assistance Demonstration (RAD), HABC is required to reduce the annual debt service payments for a Capital Fund Financing loan in order to sustain an adequate loan security ratio.

C. Local Asset Management Plan

V.2. Plan. Local Asset Management Plan							
B. MTW Plan: Local Asset Management Plan							
<p>Is the PHA allocating costs within statute?</p> <p>Is the PHA implementing a local asset management plan (LAMP)?</p>	<table style="margin: auto;"> <tr> <td style="border: 1px solid black; width: 40px; height: 40px; background-color: yellow;"></td> <td style="padding: 0 10px;">or</td> <td style="border: 1px solid black; width: 40px; height: 40px; background-color: yellow; text-align: center; color: blue;">No</td> </tr> <tr> <td style="border: 1px solid black; width: 40px; height: 40px; background-color: yellow; text-align: center; color: blue;">Yes</td> <td style="padding: 0 10px;">or</td> <td style="border: 1px solid black; width: 40px; height: 40px; background-color: yellow;"></td> </tr> </table>		or	No	Yes	or	
	or	No					
Yes	or						
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>							
<p>Has the PHA provided a LAMP in the appendix?</p>	<table style="margin: auto;"> <tr> <td style="border: 1px solid black; width: 40px; height: 20px; background-color: yellow; text-align: center; color: blue;">Yes</td> <td style="padding: 0 10px;">or</td> <td style="border: 1px solid black; width: 40px; height: 20px; background-color: yellow;"></td> </tr> </table>	Yes	or				
Yes	or						
<p>PHAs should provide a brief summary of any changes in the Local Asset Management Plan in the body of the Plan.</p>							

HUD approved HABC's Local Asset Management Program as part of the FY 2010 Annual Plan submission. Proposed updated cost allocation calculations for FY 2015 are included in Appendix C. The indirect cost rate for 2015 will be 12.03% for MTW and 11.86% for non-MTW. These rates are consistent with the FY14 results, which were 11.95 for MTW and 11.75% for non-MTW.

VI. Administrative

Pursuant to Attachment B Section VI of HABC's MTW Agreement with the Department of Housing and Urban Development (HUD) the Fiscal Year 2015 MTW Annual Plan was made available for public review and comment for thirty (30) days beginning February 28, 2014, and ending on March 29, 2014. Copies of the FY 2015 Annual Plan were available at HABC's main offices, the Enoch Pratt Free Library and on the website at www.baltimorehousing.org. A public hearing was held on March 24, 2014 at 201 N. Aisquith Street, Baltimore MD 21202. Seventy-four (74) people attended the public meeting, and HABC reviewed and considered all comments that were received no later than March 31, 2014. Signed copies of the Board Resolution signifying approval of the FY 2015 Annual Plan and the Certification of Compliance with Regulations signifying the adoption of same are included as Appendix A.

HABC will continue to monitor and evaluate MTW activities during FY 2015. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

This section of the Plan also provides the list of a series of appendixes including materials required by HUD pursuant to the MTW Agreement and other information provided by HABC to inform HUD and the public of its MTW activities. The following is a list of appendixes:

Appendix A: Board Resolution and Certification of Compliance

Appendix B: Asset Management Table

Appendix C: FY 2012 Proposed Cost Allocation Methodology & Local Asset Management Plan

Appendix D: Certifications (Previously submitted electronically to HUD)

- HUD-50071 – Certification of Payments to Influence Federal Transactions
- SF-424 – Application for Federal Assistance
- HUD-52723 – Operating Fund Calculation of Operating Subsidy

Appendix E: Summary of Proposed Changes to the Thompson Special Admin Plan

Appendix F: Summary of Proposed Changes to the HCV Administrative Plan

Appendix G: Summary of Proposed Changes to the Public Housing ACOP

Appendix H: General Housing Information (Sections II and V)

Appendix I: Certification of Compliance

Appendix J: Emergency Safety & Security Grant

Appendix K: Non-MTW Related Information

Appendix L: Privately Managed Portfolio

Appendix M: RAD Special Amendment Documentation

Appendix N: Amendments to the Annual Plan

Appendix O: Changes Due to Comments

Appendix P: Long-Term Affordable Criteria

Appendix Q: HCVP Owner Self-Certification (Risk-Based Inspections) Form